Colorado Department of Public Health and Environment

OPERATING PERMIT

CF&I Steel, L.P. dba EVRAZ Rocky Mountain Steel (ERMS)
Steelmaking

First Issued: December 1, 2001
Renewed: December 28, 2010
Last Revised: February 11, 2014

AIR POLLUTION CONTROL DIVISION
COLORADO OPERATING PERMIT

FACILITY NAME:	EVRAZ Rocky Mountain Steel Mill –Steelmaking	OPERATING PERMIT NUMBER
FACILITY ID:	1010048	**95OPPB097**
RENEWED:	December 28, 2010	
EXPIRATION DATE:	December 28, 2015	
MODIFICATIONS:	See Appendix F of Permit	

Issued in accordance with the provisions of Colorado Air Pollution Prevention and Control Act, 25-7-101 et seq. and applicable rules and regulations.

ISSUED TO:

CF&I Steel, L.P. dba EVRAZ Rocky Mountain Steel
P.O. Box 316
Pueblo, CO 81004

PLANT SITE LOCATION:

Rocky Mountain Steel Mill – Steelmaking
2100 South Freeway
Pueblo, CO 81004

INFORMATION RELIED UPON

Operating Permit Renewal Application Received:	December 1, 2005
And Additional Information Received:	November 3, 2008, October 5, 2010

Nature of Business:	Manufacture steel
Primary SIC:	3312

RESPONSIBLE OFFICIAL

Name:	Ben Lutze
Title:	Vice President and General Manager
Phone:	719-561-6600

FACILITY CONTACT PERSON

Name:	Craig West
Title:	Environmental Manager
Phone:	719-561-6536

SUBMITTAL DEADLINES –

Semi-Annual Monitoring Period:	December 1 – May 31; June 1 – November 30
Semi-Annual Monitoring Report:	July 1, 2011 and January 1, 2012 and subsequent years
Annual Compliance Period:	December 1 – November 30
Annual Compliance Certification:	January 1, 2012 and subsequent years

Note that the Semi-Annual Monitoring Reports and Annual Compliance Certifications must be received at the Division office by 5:00 p.m. on the due date. Postmarked dates will not be accepted for the purposes of determining the timely receipt of those reports/certifications.

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SECTION I - General Activities and Summary

1. Permitted Activities

1.1 The entire facility at this site is a steel manufacturing plant. The sources addressed in this operating permit are those related to the portion of the plant dedicated to the production of steel. The process melts steel scrap and refines the steel before making steel billets to provide to the other processing mills at the plant. The following processes are involved with the steel production:

The Electric Arc Furnace (EAF) melts the steel scrap. The scrap is mixed with various materials (fluxes) to produce the billets.

Meltshop	Emissions are associated with the storing and transferring of the flux material, and the handling of the molten steel.
Ladle Metallurgy Station	Materials are added to refine the steel as needed for end use.
Vacuum Degasser	Dissolved gases are removed from the molten steel and passed through a flare to reduce the carbon monoxide emissions.
Vacuum Degasser Boiler	The boiler is used to provide steam needed for generating the vacuum for degassing the molten steel.
Steel Casters	A round caster is used.
Trestle Unloading	Rail cars of flux materials are off-loaded.

The facility is located adjacent to Interstate 25 on the south side of Pueblo, Colorado at 2100 South Freeway. The area in which the plant operates is designated as attainment for all criteria pollutants.

There are no affected states within 50 miles of the plant. The Great Sand Dunes National Monument is a Federal Class I designated area within 100 kilometers of the facility. Florissant Fossil Beds National Monument is a Federal land area within 100 kilometers of the facility. Florissant Fossil Beds National Monument has been designated by the State to have the same sulfur dioxide increment as a Federal Class I area.

1.2 Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air pollutants from this facility in accordance with the requirements, limitations, and conditions of this permit.

1.3 The Operating Permit incorporates the applicable requirements contained in the underlying construction permits, and does not affect those applicable requirements, except as modified

during review of the application or as modified subsequent to permit issuance using the modification procedures found in Regulation No. 3, Part C. These Part C procedures meet all applicable substantive New Source Review requirements of Part B. Any revisions made using the provisions of Regulation No. 3, Part C shall become new applicable requirements for purposes of this Operating Permit and shall survive reissuance. This permit incorporates the applicable requirements (except as noted in Section II) from the following construction permits:

93PB1073-4	Round Caster
93PB1073-1	Vacuum Degasser Boiler
93PB1073-2	Vacuum Degasser Vent
93PB1073-8	Ladle Metallurgy Station
02PB0492	Electric Arc Furnace (EAF)
08PB1241	Preheat Burners
09PB0883	Refractory Reline

This Operating Permit also incorporates applicable requirements from the Federal Consent Decree (Civil Action No. 03-M-0608), State of Colorado CDPHE APCD Consent Decree, Judgment and order (Case No: 2000 CV 47), and State of Colorado CDPHE APCD Compliance Order on Consent Case No. 2004-015, Case No. 2007-077, and 0005-03.

1.4 All conditions in this permit are enforceable by US Environmental Protection Agency, Colorado Air Pollution Control Division (hereinafter Division) and its agents, and citizens unless otherwise specified. **State-only enforceable conditions are:** Permit Condition Number(s): Section II – Condition 1.12, Section IV – Condition 3.g (last paragraph), 14 & 18 (as noted).

1.5 All information gathered pursuant to the requirements of this permit is subject to the Recordkeeping and Reporting requirements listed under Condition 22 of the General Conditions in Section IV of this permit. Either electronic or hard copy records are acceptable.

2. Alternative Operating Scenarios

2.1 The permittee shall be allowed to make the following changes to its method of operation without applying for a revision of this permit.

2.1.1 No separate operating scenarios have been specified.

3. Prevention of Significant Deterioration

3.1 This facility is located in an area designated attainment for all pollutants. It is categorized as a major stationary source (Potential to Emit $\geq$ 100 Tons/Year for Total Suspended Particulate Matter, Nitrogen Oxides, and Carbon Monoxide). Future modifications at this facility resulting in a significant net emissions increase (see Reg 3, Part D, Sections II.A.26 and 42) for any pollutant as listed in Regulation No. 3, Part D, Section II.A.42 or a modification which is major by itself (i.e. a Potential to Emit of $\geq$ 250 TPY of any pollutant listed in Regulation No. 3, Part D, Section II.A.42) may result in the application of the PSD review requirements.

3.2 The following Operating Permits are associated with this facility for purposes of determining the applicability of the Prevention of Significant Deterioration regulations:

Rod/Bar Mill	95OPPB088	Rail Mill	95OPPB086
Seamless Mill	95OPPB089	Utilities	95OPPB098
Harsco Metals	09OPPB341		

4. Accidental Release Prevention Program (112(r))

4.1 Based upon the information provided by the applicant, this facility is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act).

5. Compliance Assurance Monitoring (CAM)

5.1 The following emission points at this facility use a control device to achieve compliance with an emission limitation or standard to which they are subject and have pre-control emissions that exceed or are equivalent to the major source threshold. They are therefore subject to the provisions of the CAM program as set forth in 40 CFR Part 64, as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV:

Electric Arc Furnace, Ladle Metallurgy Station.

See Section II, Condition 1.19 & 3.8 for compliance assurance monitoring requirements.

6. Summary of Emission Units

6.1 The emissions units regulated by this permit are the following:

AIRS Point Number	Emission Unit Number	Description	Size	Construction Permit
114 & 129	SRC1 & SRC3	Ultra High Power eccentric bottom tapping Electric Arc Furnace (EAF) #5, Val-Fuchs, model ACEAF-150-KP-EOEBT, s/n: 90156.ROC.SE.21, with two baghouses (canopy & 4th hole).	185 ton/hr	02PB0492
039	SRC6	Mannesman Demag custom built Round Caster with natural gas fired cutting torches and tundish preheater.	22.7 mmBtu/hr	93PB1073-4
110	SRC5	Ladle Metallurgy Station with Amerex 50 RP-14-1040 baghouse.	N/A	93PB1073-8
106	SRC9	Vacuum Tank Degasser vent	N/A	93PB1073-2
105	SRC7	Cleaver Brooks, model CBL-700-4500-900, s/n: OLD 92860, natural gas fueled Vacuum Tank Degasser Boiler.	37.0 mmBtu/hr	93PB1073-1
112	SRC8	Trestle Off-Loading of rail cars transporting flux materials.	N/A	Grandfathered
122	SRC31, SRC32, & SRC33	Ladle Preheat Burners (five stations).	L1 & L2: 24.0 P3: 10.5 L3 & P4: 22.5 (total mmBtu/hr)	08PB1241
123	SRC13W	Scrap pile operations.	N/A	Grandfathered
125	SRC30	Reline Ladle Refractory Process, including the use of binder material, refractory brick, and natural gas fueled burners.	Two 8.0 mmBtu/hr burners	09PB0883
128	SRC221, SRC222, & SRC223	EAF wind erosion.	N/A	Grandfathered

Note: The following Conditions (Section I.7, I.8, I.9, I.10) are State and Federally enforceable.

7. Environmental Management System (EMS)

7.1 ERMS shall operate and maintain the EMS approved by EPA on January 13, 2005, or the most recently approved version of the EMS (Consent Decree Civil Action: 03-M-0608).

8. Annual Audits

8.1 ERMS shall conduct annual environmental audits in accordance with the audit plan approved by EPA on October 22, 2009 (see Appendix L), or the most recently approved version of the Audit Plan (Consent Decree Civil Action: 03-M-0608).

9. Air Pollution Control Division, Colorado Department of Public Health and Environment Consent Decree, Judgment and Order (Case No.: 2000 CV 47)

9.1 The requirements of paragraphs 39, 43, and 45 have been incorporated into Section II of this permit at Conditions 1.2, 1.11, 1.18, and 1.20.

REPORTING

9.2 (Paragraph 46) Within thirty (30) days after the end of each calendar quarter, continuing until the Decree is terminated, RMSM shall provide a quarterly report to the Division regarding the immediately preceding quarter that contains all the information the Decree requires RMSM to report on a quarterly basis.

9.3 (Paragraph 47) Quarterly reports shall include the following information:

9.3.1 A description of construction accomplished, progress made toward meeting deadlines, and any actual, expected or reasonably likely delays;

9.3.2 Copies of all Method 9 opacity reports made during the quarter;

9.3.3 Copies of all logs required to be maintained pursuant to Paragraphs 10, 11, 12, and 13;

9.3.4 Copies of all baghouse maintenance logs developed by RMSM and Serbaco or other baghouse maintenance company hired by RMSM pursuant to the Consent Order #1; and

9.3.5 Copies of all records required to be submitted pursuant to the parametric monitoring plan required under Paragraph 20.

9.4 Note: This quarterly reporting requirement ends upon termination of the decree.

10. United States District Court for the District of Colorado, Consent Decree (Civil Action: 03-M-0608)

INTERIM AND EARLY EMISSION CONTROLS AND LIMITATIONS

10.1 (Paragraph 22) Defendant shall install a deep storage canopy hood at #4 EAF, including ductwork, actuators, and dampers by the start up date for the retrofitted EAF #4 (see Paragraph 26). These components will be brand new (as opposed to used) components unless certain used components are deemed in good condition, serviceable and adequate to enable compliance with applicable emission limitations pursuant to Paragraph 33. Defendant shall design, construct, and install such deep storage canopy hood to ensure capture of emissions to the greatest extent practicable from #4 EAF, retrofitted as described in Paragraph 24, to the associated baghous(s), and to meet the emission limitations included in Colorado SIP Regulation No. 1, §§ II. And V. and Regulation No. 6 (those portions adopting by reference the federal New Source Performance Standards, 40 C.F.R. Part 60, Subparts A and AAa, and any relevant Prevention of Significant Deterioration requirement.

10.1.1 Note: The deep storage canopy was installed with EAF #5 and shall be maintained and operated in accordance with Section II, Condition 1.23.

EAF #4 RETROFIT REQUIREMENTS, CONSTRUCTION SCHEDULE AND EMISSION LIMITATIONS

10.2 (Paragraph 24) In accordance with the schedule set forth in Paragraph 26 [of the Decree], RMSM shall properly design and implement a retrofit to #4 EAF to make it an Ultra High Power furnace. This retrofit subjects RMSM to the NSPS requirements found in 40 CFR Part 60, Subpart AAa and the PSD requirements of the Clean Air Act and Colorado SIP Regulation No. 3, 5 CCR 1001-5, Part B. As part of the retrofit to EAF #4, RMSM shall construct an improved robust emission control system that accomplishes compliance with the New Source Performance Standards Subpart AAa and the PSD program, including Best Available Control Technology for PM, NO_X, CO and SO_2. RMSM shall comply with NSPS Subpart AAa and all PSD requirements in accordance with the compliance deadlines set forth in this Section [of the Decree].

10.2.1 Note: EAF #5 started up on October 28, 2005. The NSPS, PSD, and BACT requirements are detailed in Section II, Conditions 1.1 – 1.7, 1.9, 1.13, and 1.14.

10.3 (Paragraph 26.d) RMSM shall comply fully with the NSPS Subpart AAa and all PSD requirements. These requirements include, but are not limited to the following emission limitations:

10.3.1 3.0% opacity, as averaged over each separate 6-minute period, from each baghouse used to control emissions from the retrofitted EAF including any emissions captured by any overhead canopy and the local tapping hood required under paragraph 31.

10.3.2 6.0% opacity, as averaged over each separate 6-minute period, from any building, from the operations of the retrofitted EAF.

10.3.3 10.0% opacity, as averaged over each separate 6-minute period, from any dust handling system(s) associated with the EAF.

10.3.4 Note: EAF #5 started up on October 28, 2005. The NSPS, PSD, and BACT requirements are detailed in Section II, Conditions 1.1 – 1.7, 1.9, 1.13, and 1.14.

10.4 (Paragraph 31) RMSM shall install and utilize a properly designed local tapping hood for control of tapping emissions to the greatest extenet practicable at the retrofitted EAF to meet the emission limitations included in Regulation No. 1, §§ II and V, the NSPS , and any relevant PSD requirement no later than the start up date of the retrofitted EAF.

10.4.1 Note: The local tapping hood was installed with EAF #5 and shall be maintained and operated in accordance with Section II, Condition 1.23.

10.5 (Paragraph 32) RMSM shall install a continuous opacity monitoring system ("COMS"), that, at a minimum, meets the requirements of Performance Specification 1, Appendix B of 40 CFR Part 60, on any baghouse used to capture fourth hole emissions from the retrofitted EAF. COMS data will be used as a compliance indicator below 5% opacity and shall be considered conclusive evidence of a violation at or above 5% opacity. An enforceable Parametric Monitoring Plan will be developed by RMSM for approval by EPA for any baghouse used to capture fourth hole emissions directly from the retrofitted EAF, below 5% opacity, as read by the COMS. As a compliance indicator, COMS data showing opacity below 5% may be used to assess stipulated penalties, but in such case RMSM shall be entitled to argue that COMS data showing opacity below 5% is not accurate.

10.5.1 Note: COMS were installed prior to furnace startup and the requirements are detailed in Section II, Conditions 1.2 and 1.9.

10.6 (Paragraph 34) RMSM shall install a properly designed drop-out box before the baghouse(s) dedicated to the fourth hole of the retrofitted EAF to remove larger entrained solid matter, and to maximize the integrity of the duct work, damper systems, and baghouse(s).

10.6.1 Note: The drop-out box was installed with EAF #5 and shall be maintained and operated in accordance with Section II, Condition 1.23.

10.7 (Paragraph 36) RMSM will conduct annual stack tests, commencing with the test required under Paragraph 27 of the State Consent Decree, in accordance with and following a protocol to be approved by CDPHE and EPA, on the outlet of each baghouse associated with controlling emissions from the new retrofitted EAF to ensure compliance with PSD and NSPS Subpart AAa after the compliance date set forth in Paragraph 26(d) [of the Decree].

10.7.1 Note: Testing requirements are detailed in Section II, Condition 1.18.

10.8 (Paragraph 37) RMSM shall install ladle preheater hoods to capture the combustion exhaust of natural gas used at stations L1, L2, and L3 and vented outside the melt shop; and install ladle drying hoods, or engineer and implement an equivalently effective system (with such equivalency needed to be approved by EPA), to capture the combustion exhaust of natural gas used at stations P1 and P2.

10.8.1 Note: The ladle preheaters and ladle dry out hoods were installed on January 17, 2003 & June 30, 2003 respectively, and shall be maintained and operated in accordance with Section II, Condition 1.23.

10.9 (Paragraph 39) RMSM shall work with its scrap supplier to ensure that the scrap mix for each heat includes no more than 3% turnings and/or borings, and shall maintain records documenting this performance. RMSM has retained a third-party expert which evaluated furnace practices, including but not limited to: single charge procedures; maximizing the foaming slag to improve power consumption efficiency and to minimize emissions; controlling EAF draft to avoid over evacuation or excessive flaming based on the emissions from the EAF roof; closing slag door to the maximum extent possible during the heat; during the melting cycle, burying the arcs in the melt deep enough to minimize disruption of the foamy slag; and performing regular maintenance on the EAF cooling system in order to assure that water can flow freely throughput. The expert's recommendations will continue to be discussed with EPA and RMSM and may apply to one or both of the new EAF. Those recommendations of the expert which are approved by EPA, after RMSM has a chance to comment, shall be implemented as soon as practicable under this Consent Decree.

10.9.1 Note: The scrap mix requirement is located in Section II, Condition 1.24.

10.10 (Paragraph 40) Gross production from the new EAF and the meltshop facility shall not exceed 1,010,000 short tons of molten steel per year.

10.10.1 Note: This requirement is located in Section II, Condition 1.8.

10.11 (Paragraph 42) The pollution control system for the canopy emissions (tapping and charging and any other miscellaneous PM sources in the EAF building) shall include at a minimum a dedicated baghouse adequately sized and properly designed to ensure compliance with BACT.

10.11.1 Note: The dedicated canopy baghouse was installed with EAF #5 and shall be maintained and operated in accordance with Section II, Condition 1.23.

10.12 (Paragraph 43) A dedicated baghouse for the capture of fourth hole emissions from the new EAF, along with necessary tempering air for temperature control purposes from the canopy, shall be adequately sized and properly designed to ensure compliance with BACT. This control system shall have a (1) drop-out box as approved by EPA; (2) new fans and associated equipment adequately sized and properly designed to meet all applicable requirements; (3) upgraded dust handling system with increased capacity such that the 10% opacity standard in NSPS Subpart AAa is met; and (4) a continuous opacity monitoring system.

10.12.1 Note: The fourth hole baghouse was installed with EAF #5 and shall be maintained and operated in accordance with Section II, Condition 1.23.

10.13 (Paragraph 45) The new EAF shall be equipped with adequately sized and properly designed localized hoods for tapping emissions at the point of generation.

10.13.1 Note: The localized tapping hood was installed with EAF #5 and shall be maintained and operated in accordance with Section II, Condition 1.23.

10.14 (Paragraph 46) The canopy (deep storage) over the new EAF shall be expanded to provide additional necessary temporary storage capacity so that the charging emissions from the new EAF can be effectively evacuated to the dedicated baghouse to ensure compliance with NSPS Subpart AAa and BACT requirements.

10.14.1 Note: The deep storage canopy was installed with EAF #5 and shall be maintained and operated in accordance with Section II, Condition 1.23.

10.15 (Paragraph 47) The last sentence of Paragraph 19 [of the Decree], above, shall continue to apply after the modernization project at the meltshop. The building shall continue to be enclosed in such a manner that applicable standards will be met in the modernized melt shop. (The last sentence of Paragraph 19 reads: Defendant shall continue to implement this plan and supplement the sheeting or enclosures as necessary to meet the 20% limit).

10.15.1 Note: The building enclosures were installed prior to startup of EAF #5 and shall be maintained and operated in accordance with Section II, Condition 1.23.

10.16 (Paragraph 48) Paragraph 37 [of the Decree] above shall continue to be implemented after the modernization project, but the locations of the ladle preheating and drying stations may be redesigned and relocated during the modernization project in order to optimize process flow.

10.16.1 Note: The ladle preheaters and ladle dry out hoods were installed on January 17, 2003 & June 30, 2003 respectively, and shall be maintained and operated in accordance with Section II, Condition 1.23.

10.17 (Paragraph 49) RMSM shall install ultrasonic flow monitors to monitor the volumetric flow rates to the baghouses used for the new EAF.

10.17.1 Note: The ultrasonic flow monitors were installed with EAF #5 and shall be maintained and operated in accordance with Section II, Condition 1.23.

10.18 (Paragraph 50) RMSM shall develop and implement an EPA-approved QA/QC plan for the NOX and CO analyzers and opacity monitors.

10.18.1 Note: Requirements are detailed in Section II, Condition 1.10.

10.19 (Paragraph 51) As needed per engineering evaluation and design considerations and per review by EPA, RMSM shall upgrade all fans and baghouses to be installed for the new EAF to ensure continuing compliance with the requirements of Paragraph 33 [of the Decree].

10.19.1 Note: The upgraded fans and baghouses were installed with EAF #5 and shall be maintained and operated in accordance with Section II, Condition 1.23.

10.20 (Paragraph 53) RMSM shall confine its slag loading to inside the EAF building, minimizing emissions to the atmosphere to the greatest extent practicable.

10.20.1 Note: The slag loading building confinement was installed with EAF #5 and shall be maintained and operated in accordance with Section II, Condition 1.23.

10.21 (Paragraph 54) O&M services provided by and under supervision of Serbaco shall continue to be provided by Serbaco or other qualified contractor(s).

10.21.1 Note: Requirements are included in Section II, Condition 1.17.

10.22 (Paragraph 55) NO_X AND CO CONTROLS ON EAFs – AN INNOVATIVE CONTROL PROJECT

10.22.1 RMSM will install NO_X, CO, and O_2 analyzers along with associated sample collection probes, sample conditioning equipment, and data handling and collection equipment to gather NO_X and CO concentration data at the exit of current Baghouse #3.

10.22.2 RMSM will install the necessary equipment to allow the EAF furnace operator to be able to monitor the NOX, CO, and O2 signals referenced in (a) above in the EAF furnace pulpit. This equipment will include appropriate signal transmission and display equipment including controllers and a display computer.

10.22.3 RMSM will rely on the emission signals generated by this new monitoring equipment to reduce NOX and CO emissions from EAF#3 to the maximum extent practicable through implementing and synchronizing improvements to its current operational practices.

10.22.4 Once the new pulpit is installed for the modernized EAF, this new instrumentation will be relocated to the modernized EAF's furnace pulpit.

10.22.5 Note: The NO_X and CO monitoring systems were installed with EAF #5 and shall be maintained and operated in accordance with Section II, Condition 1.23.

<u>PARAMETRIC MONITORING REQUIREMENTS FOR THE EAFs, LADLE METALLURGICAL FURNACE (LMF), RAIL AND ROD/BAR REHEAT FURNACES AND ASSOCIATED CONTROL EQUIPMENT</u>

10.23 (Paragraph 58) Parametric monitoring shall be conducted by establishing, through testing or otherwise as approved by EPA, the parameters that need to be controlled and the appropriate operating criteria to be maintained for each such parameter in order to ensure proper operation of the control technology systems installed and other identified process parameters at the facility.

10.23.1 Note: Requirements are detailed in Section II, Condition 1.11.

10.24 (Paragraph 59) RMSM agrees that the results of the parametric monitoring requirements may be used to determine compliance with applicable emissions limits, but this does not preclude the use of any other credible evidence to determine such compliance. To demonstrate compliance, among other things, RMSM shall provide EPA with a summary of its parametric monitoring data in accordance with Reporting and Recordkeeping requirements of the Consent Decree.

10.24.1 Note: Requirements are detailed in Section II, Condition 1.11.

10.25 (Paragraph 61) The Parties will reevaluate RMSM's parametric monitoring system, and decide on any appropriate changes, based on compliance demonstration tests at the affected units as required in Paragraph 57 [of the Decree] during the life of the Consent Decree. RMSM shall provide EPA with an annual report documenting its calibration or review of the parameters and propose changes if necessary. EPA will have the opportunity to request clarification or additional data from RMSM to support the proposed changes. EPA will have 60 days after receipt of RMSM's annual report to approve or disapprove any proposed changes to the parameters.

10.25.1 Note: Requirements are detailed in Section II, Condition 1.11.

ENVIRONMENTAL MANAGEMENT SYSTEM

10.26 (Paragraph 63) RMSM shall complete and begin implementation of the EMS within ninety days of receiving EPA's comments.

10.26.1 Note: Ongoing requirement listed in Section I, Condition 7.

ENVIRONMENTAL AUDITS

10.27 (Paragraph 66) RMSM shall conduct an annual Clean Air Act audit of the facility in accordance with the approved Clean Air Act Audit Program, incorporating the recommendations of the Third Party as agreed to by RMSM and EPA, and complying with the requirements of this Consent Decree as set forth in Paragraphs 67-76 [of the Decree].

10.27.1 Note: Ongoing requirement listed in Section I, Condition 8.

OTHER PROVISIONS

10.28 (Paragraph 85) Beginning with the first full calendar quarter after the Date of Entry of the Consent Decree, RMSM shall submit to EPA within thirty (30) days after the end of each

calendar quarter during the life of the Consent Decree a calendar quarterly progress report ("quarterly report"). This quarterly report shall contain the following: progress report on the implementation of the requirements of Sections V – XII [of the Decree] above; a summary of the emissions data as required by the Consent Decree for the calendar quarter; a summary of the parametric monitoring data required by Paragraphs 57-61 of the Decree for the calendar quarter; a description off any problems anticipated with respect to meeting the requirements of Sections V-IX of the Decree; a description of all SEP and additional relief implementation activities in accordance with Paragraphs 81-84 of the Decree; and any such additional matters as RMSM believes should be brought to the attention of the United States EPA.

10.28.1 Note: This quarterly reporting requirement ends upon termination of the decree.

SECTION II - Specific Permit Terms

1. Electric Arc Furnace (EAF) #5 – 185 ton/hr (AIRS# 114 & 129)

Unless otherwise specified, limits represent total from the EAF (SRC 1 + SRC 3)

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
BACT Requirements	1.1				See Condition 1.1	
PM	1.2	0.0018 grain/dscf (filterable)	89.2 ton/yr	From Source Testing	Source Testing	Annually
PM_{10}		0.0052 grain/dscf (incl. condensible)	89.2 ton/yr		Record keeping and calculation	Monthly
		3% Opacity			COMS	
VOC	1.3	0.13 lb/ton	65.7 ton/yr	From Source Testing	Source Testing	5 yrs.
					Record keeping and calculation	Monthly
Pb	1.4	0.00057 lb/ton	0.3 ton/yr	From Source Testing	Source Testing	5 yrs.
					Record keeping and calculation	Monthly
SO_2	1.5	0.15 lb/ton	75.8 ton/yr	From Source Testing	Source Testing	5 yrs.
					Record keeping and calculation	Monthly
NO_X	1.6	0.28 lb/ton	141.4 ton/yr	CEMS (SRC 3) & Source Testing (SRC 1)	Source Testing	Annually
					CEMS	Continuous
CO	1.7	2.0 lb/ton	1010.0 ton/yr	CEMS	CEMS	Continuous
Steel Production	1.8	185 ton/hr (averaged daily on a calendar day basis)	1,010,000 ton/yr		Record keeping and calculation	Daily & Monthly
CEMS	1.9				See Condition 1.9	
QA/QC Plan	1.10				See Condition 1.10	
Parametric Monitoring Plan	1.11				Follow current plan	

Parameter	Permit Condition Number	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
PM from Manufacturing Process	1.12	$17.31(P)^{0.16}$ lb/hr			Record keeping and calculation	Monthly
NSPS – Subpart AAa	1.13	0.0052 gr/dscf 3% opacity, 6% opacity & 10% opacity			See Condition 1.13	
NSPS General Conditions	1.14				See Condition 1.14	
Opacity	1.15	Not to Exceed 20%			See Condition 1.15	
	1.16	For certain operational activities – Not to Exceed 30%			See Condition 1.16	
Third part maintenance contractor	1.17				See Condition 1.17	
Source Testing	1.18				See Condition 1.18	
Compliance Assurance Monitoring	1.19	See Condition 1.19			See Condition 1.19	
Division Access	1.20					
Ambient Air Boundary Plan	1.21				See Condition 1.21	
Post Construction Monitoring	1.22	Monitoring required for Pb, PM_{10}, NO_2, ozone, meteorology.			See Condition 1.22	
Operation & Maintenance of CD equipment	1.23					
Scrap Mix	1.24	Not to exceed 3% turnings and/or borings			Record keeping and calculation	Monthly

1.1 The EAF is subject to the requirements of the Prevention of Significant Deterioration (PSD) Program. Best Available Control Technology (BACT) shall be applied for control of Particulate Matter (PM), Particulate Matter<10 μm (PM_{10}), Nitrogen Oxides (NO_X), Carbon Monoxide (CO), Volatile Organic Compounds (VOC), Sulfur Dioxide (SO_2), and Lead (Pb). BACT has been determined to be as follows:

1.1.1 The air pollution capture and control systems associated with the EAF operations shall be designed and constructed to provide for an annual margin of 20% and a short-term margin (averaged over each calendar quarter) of 40% excess capacity. The air pollution capture and control systems shall also be designed installed and operated in a manner to ensure complete capture of the emissions generated by the EAF operations, as demonstrated by full compliance with the production and process rate limits, and the emission limits and standards (including the opacity limits) described in this permit and other applicable requirements. (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3)

1.1.2 BACT for PM and PM_{10} has been determined to be the use of properly designed, constructed and operated high efficiency baghouses (SRC 1 and SRC 3) with emission limits identified in Condition 1.2. These baghouses shall be equipped with bags using PTFE membrane or PTFE membrane over fiberglass/Nomex/aramid/polyester materials. The permittee shall also install, operate, and maintain properly designed drop-out boxes upstream of the SRC 3 baghouse to remove larger entrained solid matter and to protect the integrity of the duct work, damper systems and baghouses. (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3)

The permittee shall install and operate the deep storage canopy hood system at the EAF and shall eliminate all unnecessary openings as defined in the Division-approved closure plan through the use of sheeting, enclosures or other means to ensure that the opacity of visible emissions from the EAF/BOF/teeming aisle buildings does not exceed 6% (BACT), as measured by EPA Test Method 9. The permittee shall maintain sufficient negative pressure in the EAF/BOF/teeming aisle buildings through a properly designed and operated ventilation system to ensure that emissions do not escape from the buildings in excess of 6% opacity as measured by EPA Test Method 9. (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3)

1.1.3 BACT for VOC has been determined to be the use of process controls with emission limits as identified in Condition 1.3. The proportion of oily scrap (borings, turnings, properly drained used oil filters, etc.) charged in each batch shall not exceed 3% of the total scrap. Compliance records shall be maintained and made available to the Division for review upon request. (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3)

1.1.4 BACT for Pb has been determined to be the use of process controls, and the application of high efficiency baghouses (SRC 1 and SRC 3) equipped with membrane bags, with emission limits as identified in Condition 1.4. (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3)

1.1.5 BACT for NO_X, SO_2, and CO has been determined to be the use of process controls with emission limits as identified in Condition 1.5 – 1.7 (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3)

1.2 Total Particulate Matter (PM), and Particulate Matter<10 μm (PM_{10}) emissions from the EAF are subject to the following requirements:

1.2.1 For purposes of BACT, filterable PM & PM_{10} emissions from the EAF shall not exceed 0.0018 grain per dry standard cubic foot from each of the baghouses (SRC 1 and SRC 3) as measured by EPA Test Method 5. Total PM & PM_{10} emissions, including condensable particulate matter, from the EAF shall not exceed 0.0052 grain per dry standard cubic foot from each of the baghouses (SRC 1 and SRC 3) as measured by EPA Test Method 5/Method 202. The averaging times for these limits shall be set based on the duration of the applicable test method(s) required to demonstrate compliance. (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3)

1.2.2 For purposes of BACT, the opacity of visible emissions vented to the atmosphere from baghouses SRC 1 and SRC 3 shall not exceed 3% as measured by EPA Test Method 9 (SRC 1) and COMS (SRC 3). (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3).

1.2.3 Total Particulate Matter (PM), and Particulate Matter<10 μm (PM_{10}) emissions from the EAF shall not exceed the annual limitations stated in Summary Table 1 above (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3). The emission factors (lb/ton steel) determined from the most recent Division-approved source testing shall be used to calculate emissions from the EAF, as follows:

Monthly emissions of each pollutant shall be calculated by the end of the subsequent month using the appropriate emission factors (from the most recent Division-approved source testing results) and the monthly steel production in the equation below:

Lb/mo = CEF (lbs/ton) x Monthly Steel Production (ton/mo)

A twelve-month rolling total of emissions will be maintained in order to monitor compliance with the annual emission limitations. By the end of each month, a new twelve-month total shall be calculated using the previous twelve months' data.

Source testing shall be conducted on an annual basis (SRC 1 & SRC 3) in accordance with the requirements of Condition 1.18 to monitor compliance with the PM and PM_{10} BACT limits and the annual limits.

Opacity from SRC 3 shall be monitored using the Continuous Opacity Monitoring System (COMS) as outlined in Condition 1.9. The COMS shall at a minimum meet the requirements of

Performance Specification 1, Appendix B of the NSPS Part 60 (Consent Decree, Judgment and Order Case No. 2000 CV 47). Based on the unavailability of suitable calibration filters for the COMS, compliance is monitored at an opacity level of 5%. COMS data will be used as a compliance indicator below 5%, and shall be enforceable at or above 5% opacity.

Opacity from SRC 1 shall be monitored via daily Method 9 visible emission determinations as outlined in the CAM plan required by Condition 1.19. Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows the opacity is less than the opacity limit. Records of all opacity observations shall be maintained for Division review upon request.

1.3 Total VOC emissions from the EAF are subject to the following requirements:

1.3.1 For purposes of BACT, total VOC emissions from the EAF shall not exceed 0.13 pound per ton of steel produced. The averaging time for this limit shall be set based on the duration of the applicable test method(s) required to demonstrate compliance (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3).

1.3.2 Total VOC emissions from the EAF shall not exceed the annual limitations stated in Summary Table 1 above (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3). The emission factors (lb/ton steel) determined from the most recent Division-approved source testing shall be used to calculate emissions from the EAF, as follows:

Monthly emissions shall be calculated by the end of the subsequent month using the appropriate emission factors (from the most recent Division-approved source testing results) and the monthly steel production in the equation below:

Lb/mo = CEF (lbs/ton) x Monthly Steel Production (ton/mo)

A twelve-month rolling total of emissions will be maintained in order to monitor compliance with the annual emission limitations. By the end of each month, a new twelve-month total shall be calculated using the previous twelve months' data.

Source testing shall be conducted (SRC 1 & SRC 3) at least once every five years in accordance with the requirements of Condition 1.18 to monitor compliance with the VOC BACT limit and annual limit.

1.4 Total Pb emissions from the EAF are subject to the following requirements:

1.4.1 For purposes of BACT, total Pb emissions from the EAF shall not exceed 0.00057 pound per ton of steel produced. The averaging time for this limit shall be set based on the duration of the applicable test method(s) required to demonstrate compliance.

(Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3)

1.4.2 Total Pb emissions from the EAF shall not exceed the annual limitations stated in Summary Table 1 above (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3). The emission factors (lb/ton steel) determined from the most recent Division-approved source testing shall be used to calculate emissions from the EAF, as follows:

Monthly emissions shall be calculated by the end of the subsequent month using the appropriate emission factors (from the most recent Division-approved source testing results) and the monthly steel production in the equation below:

Lb/mo = CEF (lbs/ton) x Monthly Steel Production (ton/mo)

A twelve-month rolling total of emissions will be maintained in order to monitor compliance with the annual emission limitations. By the end of each month, a new twelve-month total shall be calculated using the previous twelve months' data.

Source testing shall be conducted (SRC 1 & SRC 3) at least once every five years in accordance with the requirements of Condition 1.18 to monitor compliance with the Pb BACT limit and annual limit.

1.5 Total SO_2 emissions from the EAF are subject to the following requirements:

1.5.1 For purposes of BACT, total SO_2 emissions from the EAF shall not exceed 0.15 pound per ton of steel produced. The averaging time for this limit shall be set based on the duration of the applicable test method(s) required to demonstrate compliance. (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3)

1.5.2 Total SO_2 emissions from the EAF shall not exceed the annual limitations stated in Summary Table 1 above (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3). The emission factors (lb/ton steel) determined from the most recent Division-approved source testing shall be used to calculate emissions from the EAF, as follows:

Monthly emissions shall be calculated by the end of the subsequent month using the appropriate emission factors (from the most recent Division-approved stack testing results) and the monthly steel production in the equation below:

Lb/mo = CEF (lbs/ton) x Monthly Steel Production (ton/mo)

A twelve-month rolling total of emissions will be maintained in order to monitor compliance with the annual emission limitations. By the end of each month, a new twelve-month total shall be calculated using the previous twelve months' data.

Source testing shall be conducted (SRC 1 & SRC 3) at least once every five years in accordance with the requirements of Condition 1.18 to monitor compliance with the SO_2 BACT limit and the annual limit.

1.6 Total NO_X emissions from the EAF are subject to the following requirements:

1.6.1 For purposes of BACT, total NO_X emissions from the EAF shall not exceed 0.28 pound per ton of steel produced, averaged on a 30-day rolling average basis. (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3)

1.6.2 Total NO_X emissions from the EAF shall not exceed the annual limitations stated in Summary Table 1 above (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3). Monthly emissions shall be calculated by the end of the subsequent month using the appropriate methods outlined below.

Emissions from the EAF SRC 3 shall be monitored using data from the Continuous Emission Monitoring System (CEMS) as required in Condition 1.9.

Emissions from the EAF SRC 1 shall be calculated using a SRC1/SRC3 ratio of 0.53 using the equation below:

SRC 1 NO_X emissions (lbs/month) = SRC 3 NO_X emissions (lbs/month) x 0.53

ERMS shall review the SRC1/SRC3 ratio annually within 75 days of completion of the annual NO_X SRC 1 stack testing required in Condition 1.18. The results of the annual Division-approved stack testing shall be used to calculate a SRC1/SRC3 NO_X emissions ratio. Emission calculations shall be revised (starting with the month during which the testing was performed) if any testing data results in a SRC1/SRC3 ratio greater than 0.53.

A twelve-month rolling total of emissions will be maintained in order to monitor compliance with the annual emission limitations. By the end of each month, a new twelve-month total shall be calculated using the previous twelve months' data.

Source testing on emissions from SRC 1 shall be conducted on an annual basis in accordance with the requirements of Condition 1.18 to monitor compliance with the NO_X BACT limit and the annual limit.

1.7 Total CO emissions from the EAF are subject to the following requirements:

1.7.1 For purposes of BACT, total CO emissions from the EAF shall not exceed 2.0 pound per ton of steel produced, averaged on a 30-day rolling average basis. (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3)

1.7.2 Total CO emissions from the EAF shall not exceed the annual limitations stated in Summary Table 1 above (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3).

Emissions from the EAF SRC 1 and SRC 3 shall be monitored using data from the Continuous Emission Monitoring System (CEMS) as required in Condition 1.9.

A twelve-month rolling total of emissions will be maintained in order to monitor compliance with the annual emission limitation. By the end of each month, a new twelve-month total shall be calculated using the previous twelve months' data.

1.8 Total steel production shall not exceed the limitations shown in Summary Table 1 above. (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3). The records necessary to demonstrate compliance with all terms and conditions of this permit, including actual production rate, hours of operation of the EAF, and the monitoring parameters identified pursuant to the current version of the Division-approved Parametric Monitoring Plan (see Condition 1.11) shall be maintained by the applicant and made available to the Division for review upon request.

A twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitation. By the end of each month a new twelve-month total shall be calculated using the previous twelve months' data.

Compliance with the daily production limit shall be determined on a calendar day basis. By the end of each month the previous month's daily production rates shall be calculated using the previous month's data.

1.9 A continuous emission monitoring system (CEMS) and continuous opacity monitoring system (COMS) shall be installed, operated, certified, calibrated and maintained to accurately measure and record emissions of the following pollutants being discharged into the atmosphere from the 4^{th} hole baghouse (SRC 3) of this EAF: Opacity, Nitrogen Oxides (pounds per ton, tons per month, tons per rolling twelve month period, pounds per 30-day period), Carbon Monoxide (pounds per ton, tons per month, tons per rolling twelve month period, pounds per 30-day period). A CEMS shall be installed, operated, certified, calibrated and maintained to accurately measure and record emissions of the following pollutants being discharged into the atmosphere from the canopy baghouse (SRC 1) of this EAF: Carbon Monoxide (pounds per ton, tons per month, tons per rolling twelve month period, pounds per 30-day period). The CEMS shall be used to monitor compliance with the NO_X and CO emission limits and standards specified in Condition 1.6 and 1.7. Flow monitors shall also be installed, operated, calibrated and maintained to monitor flow to baghouses SRC 1 and SRC 3. (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3).

1.10 The permittee shall implement and follow a valid Quality Assurance/Quality Control (QA/QC) plan. The QA/QC plan describes how the CEMS is installed, operated, calibrated, and maintained. The QA/QC plan must be developed in accordance with the requirements of the

current version of the Air Pollution Control Division's Guidelines for Continuous Monitoring Systems in the State of Colorado. QA/QC procedures will, at a minimum, comply with the requirements of 40 CFR Part 60, Appendix F and the reporting requirements presented in the General Provisions of 40 CFR Part 60. The quality assurance/quality control plans shall be made available to the Division upon request. Revisions shall be made to the plans at the request of the Division. (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3).

1.11 The permitee shall follow the current Division-approved Parametric Monitoring Plan (Appendix I) to identify and monitor process and emission-related parameters and shall use this information to operate the EAF in a manner that minimizes pollutant emissions to the greatest extent practicable (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3, and Consent Decree, Judgment and Order Case No. 2000 CV 47).

1.12 Particulate Matter (PM) emissions from the EAF shall not exceed the limitation calculated by use of the following equation: $PE = 17.31(P)^{0.16}$ (Reference: Regulation No. 1, §III.C.1.b), where PE = Particulate Emissions in pounds per hour and P =Process weight rate in tons per hour (185 ton/hr).

Compliance with the hourly limit shall be monitored each calendar month by dividing the total estimated emissions for the month by the number of operating hours for the month. Compliance shall be determined within 30 days of the end of the month. The records of the compliance calculations shall be kept on-site for Division review upon request.

1.13 The EAF is subject to Regulation No. 6, Part A, Subpart AAa—Standards of Performance for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels Constructed After August 17, 1983, including, but not limited to, the following:

Standard for Particulate Matter

1.13.1 No gases shall be discharged into the atmosphere from the EAF control device exit that contain particulate matter in excess of 12 mg/dscm (0.0052 gr/dscf); (§60.272a(a)(1)).

1.13.2 No gases shall be discharged into the atmosphere from the EAF control device exit that exhibit 3 percent opacity or greater; (§60.272a(a)(2)).

1.13.3 No gases shall be discharged into the atmosphere from the EAF shop that exhibit 6 percent opacity or greater; (§60.272a(a)(3)).

1.13.4 No gases shall be discharged into the atmosphere from the dust-handling system that exhibit 10 percent opacity or greater; (§60.272a(a)).

Emission Monitoring

1.13.5 (SRC 3): A continuous monitoring system for the measurement of the opacity of emissions discharged into the atmosphere from the control device shall be installed, calibrated, maintained, and operated (§60.273a(a)).

1.13.6 (SRC 1): Visible emission observations shall be conducted at least once per day for at least three 6-minute periods when the furnace is operating in the melting and refining period. All visible emissions observations shall be conducted in accordance with Method 9. A bag leak detection system shall be continuously operated according to §60.273a(e) and must meet the specifications and requirements of §60.273a(e)(1) – (8). (§60.273a(c) & §60.273a(e)).

1.13.7 Procedures to determine the cause of all alarms from the bag leak detection system shall be initiated within 1 hour of an alarm. Except as provided for under §60.273a(g), the cause of the alarm must be alleviated within 3 hours of the time the alarm occurred by taking whatever corrective action(s) are necessary. (§60.273a(f)).

1.13.8 Shop opacity observations shall be conducted at least once per day when the furnace is operating in the meltdown and refining period. Shop opacity shall be determined as the arithmetic average of 24 consecutive 15-second opacity observations of emissions from the shop taken in accordance with Method 9. Shop opacity shall be recorded for any point(s) where visible emissions are observed. Where it is possible to determine that a number of visible emission sites relate to only one incident of visible emissions, only one observation of shop opacity will be required. In this case, the shop opacity observations must be made for the site of highest opacity that directly relates to the cause (or location) of visible emissions observed during a single incident (§60.273a(d)).

Monitoring of Operations

1.13.9 The owner/operator shall install, calibrate, and maintain a monitoring device that continuously records the volumetric flow rate at the control device inlet and check and record damper positions on a once-per-shift basis. (§60.274a(b)).

1.13.10 The owner/operator shall perform monthly operational status inspections of the equipment that is important to the performance of the total capture system (i.e. pressure sensors, dampers, and damper switches). This inspection shall include observations of the physical appearance of the equipment (e.g. presence of holes in ductwork or hoods, flow constrictions caused by dents or accumulated dust in ductwork, and fan erosion). Any deficiencies shall be noted and proper maintenance performed. (§60.274a(d)).

1.13.11 Records shall be maintained of all data obtained under Condition 1.13.8, and all monthly operational status inspections under Condition 1.13.9. (§60.274a(a)).

Test Methods and Procedures

1.13.12 The test methods and procedures of §60.275a shall be followed.

Recordkeeping and Reporting Requirements

1.13.13 The owner/operator shall submit a written report of exceedances of the control device opacity to the Administrator semi-annually. (§60.276a(b)).

1.13.14 Operation outside the established control system fan motor amperes or flow rates shall be reported to the Administrator semiannually. (§60.276a(e)).

1.13.15 The owner/operator shall maintain records of all shop opacity observations made in accordance with §60.273a(d). All shop opacity observations in excess of the emission limit shall indicate a period of excess emission, and shall be reported to the administrator semi-annually, according to §60.7(c). (§60.276a(g)).

1.13.16 The owner/operator shall maintain records for each bag leak detection system as outlined in §60.276a(h)(1) – (3).

1.14 In addition, the following requirements of Regulation No. 6, Part A, Subpart A, General Provisions, apply.

a. At all times, including periods of start-up, shutdown, and malfunction, the facility and control equipment shall, to the extent practicable, be maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether or not acceptable operating and maintenance procedures are being used will be based on information available to the Division, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. (Reference: Regulation No. 6, Part A. General Provisions from 40 CFR 60.11

b. No article, machine, equipment or process shall be used to conceal an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. (§ 60.12)

c. Records of startups, shutdowns, and malfunctions shall be maintained, as required under § 60.7.

d. Written notification of opacity observation or monitor demonstrations shall be submitted to the Division as required under § 60.7

e. Written notification of continuous monitoring system demonstrations shall be submitted to the Division as required under § 60.7.

f. Excess Emission and Monitoring System Performance Reports shall be submitted as required under § 60.7.

g. Performance tests shall be conducted as required under § 60.8.

h. Compliance with opacity standards shall be demonstrated according to § 60.11.

i. Continuous monitoring systems shall be maintained and operated as required under § 60.13.

1.15 Except as provided in Condition 1.16 below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. (Colorado Regulation No. 1, II.A.1).

In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed whenever compliance with the opacity requirements of Condition 1.13 is demonstrated.

1.16 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six (6) minutes in any sixty (60) consecutive minutes (Colorado Regulation No. 1, Section II.A.4).

In the absence of credible evidence to the contrary, compliance with the 30% opacity limit shall be presumed whenever compliance with the opacity requirements of Condition 1.13 is demonstrated.

1.17 The permittee shall retain a dedicated, third party maintenance contractor to perform monitoring, inspection and maintenance activities on the baghouses and associated equipment. At a minimum, one representative of the maintenance contractor shall be on-site at all times while the EAF is operating. The contractor's monitoring, inspection and maintenance procedures, and schedules shall be maintained and made available to the Division upon request. (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3).

1.18 Stack testing for particulate matter emissions (SRC 1 & SRC 3), VOC (SRC 1 & SRC 3), Lead (SRC 1 & SRC 3), SO_2 (SRC 1 & SRC 3), HF (SRC 1 & SRC 3), and NO_X (SRC 1) shall be performed on the EAF using EPA approved methods within 180 days of renewal permit issuance [December 28, 2010] to monitor compliance with the annual and BACT emission limitations of this permit.

Frequency of testing thereafter shall be as follows:

Particulate Matter	Annually (Consent Decree, Judgment and Order Case No. 2000 CV 47)
Nitrogen Oxides	Annually
*Hydrogen Fluorides (HF)	Annually

*During HF testing, the permittee shall monitor and record all additions to the scrap mix, and ensure that the additives are representative of normal operation. This information shall be submitted to the Division with the stack test report.

VOC	Annually. Less frequent testing may be allowed as detailed below.
Lead	Annually. Less frequent testing may be allowed as detailed below.
Sulfur Dioxide	Annually. Less frequent testing may be allowed as detailed below.

For VOC, Lead, and Sulfur Dioxide: (1) if the first test required by this renewal permit or any subsequent test results indicate emissions are less than or equal to 50% of the emission limit, another test is required within five years; (2) if the first test required by this renewal permit or any subsequent test results indicate emissions are more than 50%, but less than or equal to 75% of the emission limit, another test is required within three years; (3) if the first test required by this renewal permit or any subsequent test results indicate emissions are greater than 75% of the emission limit, an annual test is required until the provisions of (1) or (2) are met.

A stack testing protocol shall be submitted for Division approval at least thirty (30) calendar days prior to any performance of the test required under this condition. No stack test required herein shall be performed without prior written approval of the protocol by the Division. The Division reserves the right to witness the test. In order to facilitate the Division's ability to make plans to witness the test, notice of the date (s) for the stack test shall be submitted to the Division at least thirty (30) calendar days prior to the test. The Division may for good cause shown, waive this thirty (30) day notice requirement. In instances when a scheduling conflict is presented, the Division shall immediately contact the permittee in order to explore the possibility of making modifications to the stack test schedule. The required number of copies of the compliance test results shall be submitted to the Division within forty-five (45) calendar days of the completion of the test unless a longer period is approved by the Division.

1.19 The Compliance Assurance Monitoring (CAM) requirements in 40 CFR Part 64, as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV, apply to the EAF with respect to the particulate matter limitations identified in Condition 1.2 as follows:

1.19.1 The permittee shall follow the CAM Plan provided in Appendix G of this permit. Excursions, for purposes of reporting are as follows:

1.19.1.1 (SRC 1) An opacity value greater than 3% (6-minute average); or

1.19.1.2 (SRC 1) Presence of particulate matter above 40% of baseline scale as detected by the Particulate Monitors; or

1.19.1.3 (SRC 3) An opacity value greater than 3% (6-minute average).

Excursions shall be reported as required by Section IV, Conditions 21 and 22.d of this permit.

1.19.2 Operation of Approved Monitoring

1.19.2.1 At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment (40 CFR Part 64 § 64.7(b), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.19.2.2 Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of these CAM requirements, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions (40 CFR Part 64 § 64.7(c), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.19.2.3 Response to excursions or exceedances

a. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a

computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable (40 CFR Part 64 § 64.7(d)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

b. Determination of whether the owner of operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process (40 CFR Part 64 § 64.7(d)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.19.2.4 After approval of the monitoring required under the CAM requirements, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Division and, if necessary submit a proposed modification for this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters (40 CFR Part 64 § 64.7(e), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.19.3 Quality Improvement Plan (QIP) Requirements

1.19.3.1 Based on the results of a determination made under the provisions of Condition 1.19.2.3.b, the Division may require the owner or operator to develop and implement a QIP (40 CFR Part 64 § 64.8(a), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.19.3.2 The owner or operator shall maintain a written QIP, if required, and have it available for inspection (40 CFR Part 64 § 64.8(b)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.19.3.3 The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

a. Improved preventative maintenance practices (40 CFR Part 64 § 64.8(b)(2)(i), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

b. Process operation changes (40 CFR Part 64 § 64.8(b)(2)(ii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

c. Appropriate improvements to control methods (40 CFR Part 64 § 64.8(b)(2)(iii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

d. Other steps appropriate to correct control performance (40 CFR Part 64 § 64.8(b)(2)(iv), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

e. More frequent or improved monitoring (only in conjunction with one or more steps under Conditions 1.19.3.3.a through d above) (40 CFR Part 64 § 64.8(b)(2)(v), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.19.3.4 If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the Division if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined (40 CFR Part 64 § 64.8(c), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.19.3.5 Following implementation of a QIP, upon any subsequent determination pursuant to Condition 1.19.2.3.b, the Division or the U.S. EPA may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

a. Failed to address the cause of the control device performance problems (40 CFR Part 64 § 64.8(d)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV); or

b. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions (40 CFR Part 64 § 64.8(d)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.19.3.6 Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the federal clean air act (40 CFR Part 64 § 64.8(e), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.19.4 Reporting and Recordkeeping Requirements

1.19.4.1 Reporting Requirements: The reports required by Section V, Condition 22.d, shall contain the information specified in Appendix B of the permit and the following information, as applicable:

a. Summary information on the number, duration and cause (including unknown cause, if applicable), for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable) ((40 CFR Part 64 § 64.9(a)(2)(ii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV); and

b. The owner or operator shall submit, if necessary, a description of the actions taken to implement a QIP during the reporting period as specified in Condition 1.19.3 of this permit. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring (40 CFR Part 64 § 64.9(a)(2)(iii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.19.4.2 General Recordkeeping Requirements: In addition to the recordkeeping requirements in Section V, Condition 22.a through c.

a. The owner or operator shall maintain records of any written QIP required pursuant to Condition 1.19.3 and any activities undertaken to implement a QIP, and any supporting information required to be maintained under these CAM requirements (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions) (40 CFR Part 64 § 64.9(b)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements (40 CFR Part 64 § 64.9(b)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.19.5 Savings Provisions

1.19.5.1 Nothing in these CAM requirements shall excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping

requirement that may apply under federal, state, or local law, or any other applicable requirements under the federal clean air act. These CAM requirements shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purposes of determining the monitoring to be imposed under separate authority under the federal clean air act, including monitoring in permits issued pursuant to title I of the federal clean air act. The purpose of the CAM requirements is to require, as part of the issuance of this Title V operating permit, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of CAM (40 CFR Part 64 § 64.10(a)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.19.5.2 Nothing in these CAM requirements shall restrict or abrogate the authority of the U.S. EPA or the Division to impose additional or more stringent monitoring, recordkeeping, testing or reporting requirements on any owner or operator of a source under any provision of the federal clean air act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable (40 CFR Part 64 § 64.10(a)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.19.5.3 Nothing in these CAM requirements shall restrict or abrogate the authority of the U.S. EPA or the Division to take any enforcement action under the federal clean air act for any violation of an applicable requirement or of any person to take action under section 304 of the federal clean air act (40 CFR Part 64 § 64.10(a)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

1.20 Inspectors with the Division shall at all times be allowed immediate access to the main roadways and parking lots of the facility upon presentation of a State identification badge. The permittee shall not delay entrance of these inspectors pending arrival of an escort. The inspectors are required to stay within fifteen feet of the main roadways and parking lots until a ERMS representative is available to escort the inspectors to other areas of the facility. Upon arrival of the escort, the inspectors shall be allowed access to all areas of the facility (Construction Permit 02PB0492, and Consent Decree, Judgment and Order Case No. 2000 CV 47)

1.21 Public access to plant property, including access from the lease boundary for the Davis Wire facility, shall be precluded by a fence or other effective physical barrier. Fences and barriers shall be periodically inspected and maintained to prevent public access. Roadway entrances into the property shall be gated or have security guards to control access. Small openings in the fence are allowed for railroad lines and in the immediate area around Davis Wire loading docks, but the openings must be clearly posted and routinely patrolled to prevent trespassing. The access road used by Davis Wire employees shall be posted to identify the location of the ambient air boundary. Davis Wire employees shall also be notified of the location of the ambient air boundary and instructed to use the designated routes to their facility. Public access restrictions

apply only to the property areas where air quality modeling receptors were excluded in the permit application's compliance demonstration with ambient air quality standards. The permitee shall follow the submitted ambient air boundary plan which contains detailed maps showing the elements that constitute the ambient air boundary, including the location of the fences, gates, and areas to be posted/patrolled. (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3)

1.22 Post-construction ambient monitoring shall be conducted for a minimum of twelve (12) months and shall begin within three (3) months of issuance of this permit [December 28, 2010], or within another period approved in writing by the Division. Additional post-construction monitoring beyond the twelve month period may be necessary to determine the effect emissions from the modification have, or may have, on air quality in the area. With the submittal of data for the minimum twelve month period, the permittee may request that further monitoring be waived. The Division will consider such request in the context of the data for the aforementioned purposes of post-construction monitoring, and if appropriate grant such waiver. Locations of monitoring stations and procedures for data collection, compilation and reporting shall be submitted to, and approved by, the Division. Post-construction monitoring is required for lead, particulate matter less than 10 microns (suitable for metals analysis), nitrogen dioxide, ozone, and meteorology.

1.23 The following equipment/operations were installed/initiated as required by Consent Decree and shall continue to be operated and maintained: deep storage canopy, tapping hood, dropout box, ladle preheater and dryout hood, dedicated canopy bahouse, dedicated fourth hold baghouse, building enclosures, ultrasonic flow meters, upgraded fans and baghouses, slag loading confined to building, and NO_X and CO stack analyzers on the fourth hole baghouse. (Consent Decree Civil Action: 03-M-0608).

1.24 The portion of oily scrap (e.g. borings, turnings, properly drained oil filters) charged in each batch shall not exceed 3% of the total scrap. Monthly compliance records shall be maintained and made available to the Division for review upon request. (Consent Decree Civil Action: 03-M-0608).

2. Demag Round Caster (AIRS# 039)

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
PM	2.1		37.94 ton/yr	7.6 lb/MMSCF 0.056 lb/ton steel	Record keeping and calculation	Monthly
PM_{10}			19.04 ton/yr	7.6 lb/MMSCF 0.028 lb/ton steel		
SO_2			0.01 ton/yr	0.6 lb/MMSCF		
VOC			0.10 ton/yr	5.5 lb/MMSCF		
NO_X			35.60 ton/yr	100 lb/MMSCF 0.05 lb/ton steel		
CO			1.55 ton/yr	84 lb/MMSCF		
Fuel Consumption	2.2		37.0 MMSCF/yr		Record keeping	Monthly
Steel Throughput	2.3		1,350,000 ton/yr		Record keeping	Monthly
Operating hours	2.4				Record keeping	Monthly
PM from Manufacturing Process	2.5	$17.31(P)^{0.16}$ lb/hr			Record keeping and calculation	Monthly
Opacity	2.6	Not to Exceed 20%			Method 9	At least monthly
	2.7	For certain operational activities – Not to Exceed 30%				

2.1 Total Particulate Matter (PM), Particulate Matter<10 μm (PM_{10}), Nitrogen Oxide (NO_X), Volatile Organic Compounds (VOC), Carbon Monoxide (CO) and Sulfur Dioxide (SO_2) emissions from the caster shall not exceed the limitations stated in Summary Table 2 above (Construction Permit 93PB1073-4). The emission factors listed above (from engineering estimate, AP-42 1.4 7/98) have been approved by the Division and shall be used to calculate emissions from the caster, as follows:

Monthly emissions of each pollutant shall be calculated by the end of the subsequent month using the above emission factors and the monthly fuel consumption in the equation below:

Lb/mo = [CEF (lbs/MMscf) x Monthly Fuel Use (MMscf/mo)] + [CEF (lb/ton steel) x Monthly Steel Throughput (ton steel/mo)]

A twelve-month rolling total of emissions will be maintained in order to monitor compliance with the annual emission limitation. By the end of each month, a new twelve-month total shall be calculated using the previous twelve months' data.

2.2 Total natural gas fuel consumption for the caster shall not exceed the limitation shown in Summary Table 2 above (Construction Permit 93PB1073-4). A twelve-month rolling total shall be maintained to monitor compliance with the annual limitation. By the end of each month a new twelve-month total shall be calculated using the previous twelve months' data. Monthly records of the actual fuel consumption shall be maintained and made available to the Division for inspection upon request.

The terms and conditions of this permit are based on the caster burning only natural gas. The use of any other fuel may require the permit to be re-opened prior to any use of the fuel.

2.3 Total steel throughput for the caster shall not exceed the limitation shown in Summary Table 2 above (Construction Permit 93PB1073-4). A twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitation. By the end of each month a new twelve-month total shall be calculated using the previous twelve months' data. Monthly records of the actual steel throughput shall be maintained and made available to the Division for inspection upon request.

Compliance with the steel throughput limit shall be monitored based on production records.

2.4 Total operating hours for the caster shall be recorded for each calendar month. Monthly records of the actual operating hours shall be maintained and made available to the Division for inspection upon request.

2.5 Particulate Matter (PM) emissions from the caster shall not exceed the limitation calculated by use of the following equation: $PE = 17.31(P)^{0.16}$ (Reference: Regulation No. 1, §III.C.1.b), where PE = Particulate Emissions in pounds per hour and P =Process weight rate in tons per hour, resulting in PE=39.9 pounds per hour (P=185).

Compliance with the hourly limit shall be monitored each calendar month by dividing the total estimated emissions for the month by the number of operating hours for the month. Compliance shall be determined within 30 days of the end of the month. The records of the compliance calculations shall be kept on-site for Division review upon request.

2.6 Except as provided in Condition 2.7 below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. (Colorado Regulation No. 1, II.A.1).

At least one Method 9 opacity observation shall be performed once per calendar month while the caster is operating. At least one Method 9 opacity observations shall be performed per calendar

year during a tundish exchange. If any of the tundish exchange opacity observations exceed the standard, the frequency of the opacity observations will increase to once (1) per calendar month until four (4) consecutive once per month opacity observations do not exceed the standard.

The EPA Reference Method 9 opacity observations shall be performed by an observer with a current and valid Method 9 certification. A clear and readable copy of the observer's certificate and any opacity observations shall be kept on file and made available to the Division for review upon request.

Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows the opacity is less than the opacity limit.

2.7 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six (6) minutes in any sixty (60) consecutive minutes (Colorado Regulation No. 1, Section II.A.4).

In the absence of credible evidence to the contrary, compliance with the 30% opacity limit shall be presumed based on the nature of operation of this equipment.

3. Ladle Metallurgy Station (AIRS# 110)

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
PM	3.1		7.02 ton/yr	0.0104 lb/ton steel	Record keeping and calculation	Monthly
PM_{10}			4.52 ton/yr	0.00669 lb/ton steel		
Lead			0.00427 ton/yr	$6.33e^{-6}$ lb/ton steel		
Steel Throughput	3.2		1,350,000 ton/yr		Record keeping	Monthly
Operating hours	3.3				Record keeping	Monthly
PM from Manufacturing Process	3.4	$17.31(P)^{0.16}$ lb/hr			Record keeping and calculation	Monthly
Opacity	3.5	Not to Exceed 20%			Method 9	At least monthly
	3.6	For certain operational activities – Not to Exceed 30%				
Parametric Monitoring Plan	3.7				Follow current plan	
Compliance Assurance Monitoring	3.8	See Condition 3.8			See Condition 3.8	
Source Testing	3.9				See Condition 3.9	

3.1 Total Particulate Matter (PM), Particulate Matter<10 μm (PM_{10}), and Lead (Pb) emissions from the Ladle Metallurgy Station shall not exceed the limitations stated in Summary Table 3 above (Construction Permit 93PB1073-8 as modified under the provisions of Section I, condition 1.3; lead emission limits are based on an APEN received April 18, 2012). The emission factors listed above have been approved by the Division and shall be used to calculate emissions from the Ladle Metallurgy Station, as follows:

Monthly emissions of each pollutant shall be calculated by the end of the subsequent month using the above emission factors and the monthly steel throughput in the equation below:

Lb/mo = [CEF (lb/ton steel) x Monthly Steel Throughput (ton steel/mo)]

A twelve-month rolling total of emissions will be maintained in order to monitor compliance with the annual emission limitation. By the end of each month, a new twelve-month total shall be calculated using the previous twelve months' data.

For the compliance calculation the Division used the following baghouse control efficiencies provided in the Title V application: PM - Efficiency = 99.0%; PM10 - Efficiency = 98.7%; Lead - Efficiency = 99.0%

3.2 Total steel throughput for the Ladle Metallurgy Station shall not exceed the limitation shown in Summary Table 3 above (Construction Permit 93PB1073-8 as modified under the provisions of Section I, condition 1.3). A twelve-month rolling total shall be maintained to monitor compliance with the annual limitation. By the end of each month a new twelve-month total shall be calculated using the previous twelve months' data. Monthly records of the actual steel throughput shall be maintained and made available to the Division for inspection upon request.

3.3 Total operating hours for the Ladle Metallurgy Station shall be recorded for each calendar month. Monthly records of the actual operating hours shall be maintained and made available to the Division for inspection upon request.

3.4 Particulate Matter (PM) emissions from the Ladle Metallurgy Station shall not exceed the limitation calculated by use of the following equation: $PE = 17.31(P)^{0.16}$ (Reference: Regulation No. 1, §III.C.1.b), where PE = Particulate Emissions in pounds per hour and P =Process weight rate in tons per hour, resulting in PE=39.9 pounds per hour (P=185).

Compliance with the hourly limit shall be monitored each calendar month by dividing the total estimated emissions for the month by the number of operating hours for the month. Compliance shall be determined within 30 days of the end of the month. The records of the compliance calculations shall be kept on-site for Division review upon request.

3.5 Except as provided in Condition 3.6 below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. (Colorado Regulation No. 1, II.A.1).

At least one (1) Method 9 opacity observation shall be performed once per calendar month while the station is operating. If any of the opacity observations exceed the standard additional observations must be performed. Consecutive observations shall be performed until two (2) consecutive observations are in compliance with the standard. Upon any opacity exceedance, the frequency of the opacity observations shall increase to once (1) per day until seven (7) consecutive opacity observations do not exceed the standard.

The EPA Reference Method 9 opacity observations shall be performed by an observer with a current and valid Method 9 certification. A clear and readable copy of the observer's certificate and any opacity observations shall be kept on file and made available to the Division for review upon request.

Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows the opacity is less than the opacity limit.

3.6 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six (6) minutes in any sixty (60) consecutive minutes (Colorado Regulation No. 1, Section II.A.4).

In the absence of credible evidence to the contrary, compliance with the 30% opacity limit shall be presumed based on the nature of operation of this equipment.

3.7 The permitee shall follow the current Division-approved Parametric Monitoring Plan to identify and monitor process and emission-related parameters in order to achieve and maintain the applicable PM capture and removal efficiency requirements. (United States District Court for the District of Colorado, Consent Decree (Civil Action: 03-M-0608))

3.8 The Compliance Assurance Monitoring (CAM) requirements in 40 CFR Part 64, as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV, apply to the Ladle Metallurgy Station with respect to the particulate matter limitations identified in Condition 3.1 as follows:

3.8.1 The permittee shall follow the CAM Plan provided in Appendix H of this permit. Excursions, for purposes of reporting are as follows:

3.8.1.1 An opacity value greater than 10% (6-minute average); or

3.8.1.2 Presence of particulate matter above 40% of baseline scale as detected by the Particulate Monitors.

Excursions shall be reported as required by Section IV, Conditions 21 and 22.d of this permit.

3.8.2 Operation of Approved Monitoring

3.8.2.1 At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment (40 CFR Part 64 § 64.7(b), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

3.8.2.2 Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring

malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of these CAM requirements, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions (40 CFR Part 64 § 64.7(c), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

3.8.2.3 Response to excursions or exceedances

a. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable (40 CFR Part 64 § 64.7(d)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

b. Determination of whether the owner of operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process (40 CFR Part 64 § 64.7(d)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

3.8.2.4 After approval of the monitoring required under the CAM requirements, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need

to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Division and, if necessary submit a proposed modification for this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters (40 CFR Part 64 § 64.7(e), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

3.8.3 Quality Improvement Plan (QIP) Requirements

3.8.3.1 Based on the results of a determination made under the provisions of Condition 3.8.2.3.b, the Division may require the owner or operator to develop and implement a QIP (40 CFR Part 64 § 64.8(a), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

3.8.3.2 The owner or operator shall maintain a written QIP, if required, and have it available for inspection (40 CFR Part 64 § 64.8(b)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

3.8.3.3 The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

a. Improved preventative maintenance practices (40 CFR Part 64 § 64.8(b)(2)(i), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

b. Process operation changes (40 CFR Part 64 § 64.8(b)(2)(ii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

c. Appropriate improvements to control methods (40 CFR Part 64 § 64.8(b)(2)(iii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

d. Other steps appropriate to correct control performance (40 CFR Part 64 § 64.8(b)(2)(iv), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

e. More frequent or improved monitoring (only in conjunction with one or more steps under Conditions 3.8.3.3.a through d above) (40 CFR Part 64 § 64.8(b)(2)(v), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

3.8.3.4 If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the Division if the period for completing the improvements contained in the QIP exceeds 180

days from the date on which the need to implement the QIP was determined (40 CFR Part 64 § 64.8(c), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

3.8.3.5 Following implementation of a QIP, upon any subsequent determination pursuant to Condition 3.8.2.3.b, the Division or the U.S. EPA may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

a. Failed to address the cause of the control device performance problems (40 CFR Part 64 § 64.8(d)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV); or

b. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions (40 CFR Part 64 § 64.8(d)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

3.8.3.6 Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the federal clean air act (40 CFR Part 64 § 64.8(e), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

3.8.4 Reporting and Recordkeeping Requirements

3.8.4.1 Reporting Requirements: The reports required by Section V, Condition 22.d, shall contain the information specified in Appendix B of the permit and the following information, as applicable:

a. Summary information on the number, duration and cause (including unknown cause, if applicable), for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable) ((40 CFR Part 64 § 64.9(a)(2)(ii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV); and

b. The owner or operator shall submit, if necessary, a description of the actions taken to implement a QIP during the reporting period as specified in Condition 3.8.3 of this permit. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring (40 CFR Part 64 § 64.9(a)(2)(iii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

3.8.4.2 General Recordkeeping Requirements: In addition to the recordkeeping requirements in Section V, Condition 22.a through c.

a. The owner or operator shall maintain records of any written QIP required pursuant to Condition 3.8.3 and any activities undertaken to implement a QIP, and any supporting information required to be maintained under these CAM requirements (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions) (40 CFR Part 64 § 64.9(b)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements (40 CFR Part 64 § 64.9(b)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

3.8.5 Savings Provisions

3.8.5.1 Nothing in these CAM requirements shall excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the federal clean air act. These CAM requirements shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purposes of determining the monitoring to be imposed under separate authority under the federal clean air act, including monitoring in permits issued pursuant to title I of the federal clean air act. The purpose of the CAM requirements is to require, as part of the issuance of this Title V operating permit, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of CAM (40 CFR Part 64 § 64.10(a)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

3.8.5.2 Nothing in these CAM requirements shall restrict or abrogate the authority of the U.S. EPA or the Division to impose additional or more stringent monitoring, recordkeeping, testing or reporting requirements on any owner or operator of a source under any provision of the federal clean air act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable (40 CFR Part 64 § 64.10(a)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

3.8.5.3 Nothing in these CAM requirements shall restrict or abrogate the authority of the U.S. EPA or the Division to take any enforcement action under the federal clean air act for any violation of an applicable requirement or of any person to take action under section 304 of the federal clean air act (40 CFR Part 64 § 64.10(a)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

3.9 Stack testing for SO_2, CO and NO_X shall be performed on the Ladle Metallurgy Station using EPA approved methods within 180 days of renewal permit issuance [December 28, 2010].

A stack testing protocol shall be submitted for Division approval at least thirty (30) calendar days prior to any performance of the test required under this condition. No stack test required herein shall be performed without prior written approval of the protocol by the Division. The Division reserves the right to witness the test. In order to facilitate the Division's ability to make plans to witness the test, notice of the date(s) for the stack test shall be submitted to the Division at least thirty (30) calendar days prior to the test. The Division may for good cause shown, waive this thirty (30) day notice requirement. In instances when a scheduling conflict is presented, the Division shall immediately contact the permittee in order to explore the possibility of making modifications to the stack test schedule. The required number of copies of the compliance test results shall be submitted to the Division within forty-five (45) calendar days of the completion of the test unless a longer period is approved by the Division.

4. Vacuum Tank Degassing (AIRS# 106)

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
CO	4.1		85.4 ton/yr	12.87 lb/heat	Record keeping and calculation	Monthly
Molten Steel Heats	4.2		13,271 heats/yr		Record keeping	Monthly
Opacity	4.3	Not to Exceed 20%				
	4.4	For certain operational activities – Not to Exceed 30%				

4.1 Total Carbon Monoxide (CO) emissions from the Vacuum Tank Degassing shall not exceed the limitations stated in Summary Table 4 above (Construction Permit 93PB1073-2, as modified under the provisions of Section I Condition 1.3, based on an APEN received August 27, 2013). The emission factors listed above (from engineering estimate) have been approved by the Division and shall be used to calculate emissions from the Vacuum Tank Degassing, as follows:

Monthly emissions of each pollutant shall be calculated by the end of the subsequent month using the above emission factors and the monthly heats in the equation below:

Lb/mo = [CEF (lbs/heat) x Monthly heats (heats/mo)]

A twelve-month rolling total of emissions will be maintained in order to monitor compliance with the annual emission limitation. By the end of each month, a new twelve-month total shall be calculated using the previous twelve months' data.

4.2 Total heats processed in the Vacuum Tank Degassing facility shall not exceed the limitation shown in Summary Table 4 above (Construction Permit 93PB1073-2, as modified under the provisions of Section I Condition 1.3, based on an APEN received August 27, 2013). A twelve-month rolling total shall be maintained to monitor compliance with the annual limitation. By the end of each month a new twelve-month total shall be calculated using the previous twelve months' data. Monthly records of the actual fuel consumption shall be maintained and made available to the Division for inspection upon request.

4.3 Except as provided in Condition 2.7 below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. (Colorado Regulation No. 1, II.A.1).

In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed based on the nature of operation of this equipment.

4.4 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six (6) minutes in any sixty (60) consecutive minutes (Colorado Regulation No. 1, Section II.A.4).

In the absence of credible evidence to the contrary, compliance with the 30% opacity limit shall be presumed based on the nature of operation of this equipment.

5. Cleaver Brooks natural gas fueled Vacuum Tank Degasser Boiler– 37 mmBtu/hr (AIRS# 105)

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
PM	5.1		1.23 ton/yr	7.6 lb/MMSCF	Record keeping and calculation	Monthly
PM_{10}			1.23 ton/yr	7.6 lb/MMSCF		
SO_2			0.1 ton/yr	0.6 lb/MMSCF		
VOC			0.9 ton/yr	5.5 lb/MMSCF		
NO_X			16.21 ton/yr	100 lb/MMSCF		
CO			13.6 ton/yr	84 lb/MMSCF		
Fuel Consumption	5.2		324.0 MMSCF/yr		Record keeping	Monthly
Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	5.3				Fuel use record keeping	Daily or Monthly
NSPS General Provisions	5.4				NSPS General Provisions	As defined
PM from Fuel-Burning Equipment	5.5	$0.5(FI)^{-0.26}$ lb/mmBtu			Fuel Restriction	
Opacity	5.6	Not to Exceed 20%			Fuel Restriction	
	5.7	For certain operational activities – Not to Exceed 30%				
MACT	5.8	See 40 CFR 63 Subpart DDDDD (Condition 11)			See 40 CFR 63 Subpart DDDDD (Condition 11)	

5.1 Total Particulate Matter (PM), Particulate Matter<10 μm (PM_{10}), Nitrogen Oxide (NO_X), Volatile Organic Compounds (VOC), Carbon Monoxide (CO) and Sulfur Dioxide (SO_2) emissions from the caster shall not exceed the limitations stated in Summary Table 5 above (Construction Permit 93PB1073-1, as modified under the provisions of Section I Condition 1.3, based on an APEN received August 27, 2013). The emission factors listed above (from AP-42 1.4) have been approved by the Division and shall be used to calculate emissions from the boiler, as follows:

Monthly emissions of each pollutant shall be calculated by the end of the subsequent month using the above emission factors and the monthly fuel consumption in the equation below:

Lb/mo = [CEF (lbs/MMscf) x Monthly Fuel Use (MMscf/mo)]

A twelve-month rolling total of emissions will be maintained in order to monitor compliance with the annual emission limitation. By the end of each month, a new twelve-month total shall be calculated using the previous twelve months' data.

5.2 Total natural gas fuel consumption for the boiler shall not exceed the limitation shown in Summary Table 5 above (Construction Permit 93PB1073-1, as modified under the provisions of Section I Condition 1.3, based on an APEN received August 27, 2013). A twelve-month rolling total shall be maintained to monitor compliance with the annual limitation. By the end of each month a new twelve-month total shall be calculated using the previous twelve months' data. Monthly records of the actual fuel consumption shall be maintained and made available to the Division for inspection upon request.

The terms and conditions of this permit are based on the caster burning only natural gas. The use of any other fuel may require the permit to be re-opened prior to any use of the fuel.

5.3 This boiler is subject to the requirements in 40 CFR Part 60 Subpart Dc, "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units", as adopted by reference in Colorado Regulation No. 6, Part A, including, but not limited to the following:

5.3.1 Reporting and recordkeeping requirements:

5.3.1.1 The owner or operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by §60.7 of this part. This notification shall include the items listed in §60.48c(a)(1) – (4). (40 CFR Part 60 Subpart Dc § 60.48c(a)).

5.3.1.2 The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during **each operating day**. (40 CFR Part 60 Subpart Dc § 60.48c(g)(1)).

5.3.1.3 As an alternative to meeting the requirements of paragraph (g)(1) of this section, the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in §60.48c(f) to demonstrate compliance with the SO_2 standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during **each calendar month**. (40 CFR Part 60 Subpart Dc § 60.48c(g)(2)).

5.3.1.4 All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the

date of such record. (40 CFR Part 60 Subpart Dc § 60.48c(i)).

5.4 This boiler is subject to the requirements in 40 CFR Part 60, Subpart A, "General Provisions", as adopted by reference in Colorado Regulation No. 6, Part A, including, but not limited to the following:

5.4.1 No article, machine, equipment or process shall be used to conceal an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gasses discharged to the atmosphere. (40 CFR 60 Subpart A § 60.12, as adopted by reference in Colorado Regulation No. 6, Part A).

5.4.2 At all times, including periods of startup, shutdown, and malfunction, owners and operators shall to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source (40 CFR Subpart A § 60.11(d), as adopted by reference in Colorado Regulation No. 6, Part A).

5.4.3 Records shall be maintained of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the source; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative (40 CFR Part 60 Subpart A § 60.7(b), as adopted by reference in Colorado Regulation No. 6, Part A).

5.5 The emission limit for particulate emissions is set by the Colorado Regulation No. 1, III.A.1.b equation, $PE = 0.5(FI)^{-0.26}$ where PE is the Particulate Emission in pounds per million Btu heat input and FI is the Fuel Input in million Btu per hour.

In the absence of any credible evidence to the contrary, compliance with the limit shall be presumed since only natural gas is permitted to be used as fuel.

5.6 Except as provided in Condition 5.7 below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. (Colorado Regulation No. 1, II.A.1).

In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed since only natural gas is permitted to be used as fuel for this boiler.

5.7 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up,

any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six (6) minutes in any sixty (60) consecutive minutes (Colorado Regulation No. 1, Section II.A.4).

In the absence of credible evidence to the contrary, compliance with the 30% opacity limit shall be presumed since only natural gas is permitted to be used as fuel for this boiler.

5.8 This Boiler is subject to 40 CFR Part 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants from Industrial, Commercial, and Institutional Boilers and Process Heaters, as set forth in Condition 11 of this permit.

6. Trestle Off-Loading (AIRS# 112)

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
PM & PM_{10}	6.1				Record keeping and calculation	Annual
Fugitive Particulate Emissions	6.2	Not to exceed 20% opacity			Visual Observations	Daily
		No off-property transport			Method 9	As Required
		No nuisance conditions created				

6.1 The quantity of fugitive particulate matter emissions shall be monitored for each calendar year and reported in accordance with APEN reporting procedures.

Note: The Title V application estimated emissions were based on the raw materials in use at the time the application was prepared. The raw materials included ferromanganese, silicomanganese, ferrochromium, ferrosilicon, hot briquetted iron (HBI/DRI) and burnt lime, and coal. Other materials may be used provided that all applicable requirements are met.

6.2 A daily check of the off-loading site shall be conducted to determine if visible emissions exist. Records of the observations shall be maintained and made available for Division review upon request. (NOTE: The 20% opacity, no off-property transport, and nuisance emission limitation are guidelines and not enforceable standards and no person shall be cited for violation thereof pursuant to C.R.S. 1973, 25-7-115 as amended.)

6.2.1 20% opacity - During the daily check, when visible emissions persist for longer than ten (10) continuous minutes, a Method 9 opacity observation shall be made by a person certified as a Method 9 observer to determine if the emissions are in excess of 20% opacity. Copies of all the Method 9 observations and the reader certification shall be kept on file and made available to the Division for review upon request. If 20% opacity is exceeded, the cause shall be determined and corrective actions taken. A record of the Method 9 readings, existing conditions, and the action taken shall be maintained and made available to the Division for review upon request.

6.2.2 Off-Property Transport and Nuisance Provision. During the daily check, when visible emissions exist at the trestle off-loading area and they persist for longer than ten (10) continuous minutes, an inspection shall be made to determine if the visible emissions are being transported off the property on which the source is located, or creating a nuisance. If there is off-property transport of the visible emissions, or the emissions are creating a nuisance, the cause shall be determined and corrective actions taken. A record of the existing condition and the action taken shall be maintained and made available to the Division for review upon request.

6.2.2.1 As used herein, "nuisance" shall mean the emission of fugitive particulate which constitutes a private or public nuisance as defined in common law, the essence of which is that such emissions are unreasonably interfering with another person's use and enjoyment of his property. Such interference must be "substantial" in its nature as measured by a standard that it would be of definite offensiveness, inconvenience, or annoyance to a normal person in the community.

6.2.3 If requested by the Division, a revised Control Plan shall be submitted. Sources required to submit control plans for revisions to the division shall do so within sixty days of the date such plan or revision is requested; provided, however, that the Division, in its discretion, may where appropriate establish a different time period for submittal, taking into consideration such factors as the duration of the operation of the source or activity, the significance and nature of the emissions, and the relative complexity of the operation and applicable control methods.

6.2.4 Each control plan shall include all available practical methods which are technologically feasible and economically reasonable and which reduce, prevent and control fugitive particulate emissions from the source or activity into the atmosphere. For those materials, equipment, services or other resources (such as water for abatement and control purposes) which are likely to be scarce at any given time, an alternative control method must be included in the control plan. Any source required to submit a control plan may ask for a “control plan conference” with the division, and if so requested the division shall hold such a conference for the purpose of advising what types of control measures and/or operating procedures will meet the requirements of Regulation No. 1, III.D.

7. Ladle Preheat Burners, natural gas fueled (five stations) – 57 mmBtu/hr total (AIRS# 122)

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
PM	7.1		1.90 ton/yr	7.6 lb/MMSCF	Record keeping and calculation	Monthly
PM_{10}			1.90 ton/yr	7.6 lb/MMSCF		
SO_2			0.15 ton/yr	0.6 lb/MMSCF		
VOC			1.37 ton/yr	5.5 lb/MMSCF		
NO_X			24.95 ton/yr	100 lb/MMSCF		
CO			20.96 ton/yr	84 lb/MMSCF		
Fuel Consumption	7.2		499.0 MMSCF/yr		Record keeping	Monthly
PM from Fuel-Burning Equipment	7.3	$0.5(FI)^{-0.26}$ lb/mmBtu			Fuel Restriction	
Opacity	7.4	Not to Exceed 20%			Fuel Restriction	
	7.5	For certain operational activities – Not to Exceed 30%				

7.1 Total Particulate Matter (PM), Particulate Matter<10 μm (PM_{10}), Nitrogen Oxide (NO_X), Volatile Organic Compounds (VOC), Carbon Monoxide (CO) and Sulfur Dioxide (SO_2) emissions from the burners shall not exceed the limitations stated in Summary Table 7 above (Construction Permit 08PB1241). The emission factors listed above (from AP-42 1.4) have been approved by the Division and shall be used to calculate emissions from the burners, as follows:

Monthly emissions of each pollutant shall be calculated by the end of the subsequent month using the above emission factors and the monthly fuel consumption in the equation below:

Lb/mo = [CEF (lbs/MMscf) x Monthly Fuel Use (MMscf/mo)]

A twelve-month rolling total of emissions will be maintained in order to monitor compliance with the annual emission limitation. By the end of each month, a new twelve-month total shall be calculated using the previous twelve months' data.

7.2 Total natural gas fuel consumption for the burners shall not exceed the limitation shown in Summary Table 7 above (Construction Permit 08PB1241). A twelve-month rolling total shall be maintained to monitor compliance with the annual limitation. By the end of each month a new

twelve-month total shall be calculated using the previous twelve months' data. Monthly records of the actual fuel consumption shall be maintained and made available to the Division for inspection upon request.

The terms and conditions of this permit are based on the burners burning only natural gas. The use of any other fuel may require the permit to be re-opened prior to any use of the fuel.

7.3 The emission limit for particulate emissions is set by the Colorado Regulation No. 1, III.A.1.b equation, $PE = 0.5(FI)^{-0.26}$ where PE is the Particulate Emission in pounds per million Btu heat input and FI is the Fuel Input in million Btu per hour.

In the absence of any credible evidence to the contrary, compliance with the limit shall be presumed since only natural gas is permitted to be used as fuel.

7.4 Except as provided in Condition 7.5 below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. (Colorado Regulation No. 1, II.A.1).

In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed since only natural gas is permitted to be used as fuel for this boiler.

7.5 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six (6) minutes in any sixty (60) consecutive minutes (Colorado Regulation No. 1, Section II.A.4).

In the absence of credible evidence to the contrary, compliance with the 30% opacity limit shall be presumed since only natural gas is permitted to be used as fuel for this boiler.

8. Reline Ladle Refractory Process with two 8.0 mmBtu/hr nat. gas fueled burners (AIRS# 125)

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
PM	8.1		0.53 ton/yr	7.6 lb/MMSCF	Record keeping and calculation	Monthly
PM_{10}			0.53 ton/yr	7.6 lb/MMSCF		
SO_2			0.04 ton/yr	0.6 lb/MMSCF		
VOC			19.87 ton/yr	5.5 lb/MMSCF & 253 lb/reline		
NO_X			7.01 ton/yr	100 lb/MMSCF		
CO			5.89 ton/yr	84 lb/MMSCF		
Fuel Consumption	8.2		140.16 MMSCF/yr		Record keeping	Monthly
Ladle Relines	8.3		154 relines/yr		Record keeping	Monthly
MSDS Information & Emission Factor Calculation	8.4				Record keeping and calculation	As necessary
PM from Fuel-Burning Equipment	8.5	$0.5(FI)^{-0.26}$ lb/mmBtu			Fuel Restriction	
Opacity	8.6	Not to Exceed 20%			Fuel Restriction	
	8.7	For certain operational activities – Not to Exceed 30%				

8.1 Total Particulate Matter (PM), Particulate Matter<10 μm (PM_{10}), Nitrogen Oxide (NO_X), Volatile Organic Compounds (VOC), Carbon Monoxide (CO) and Sulfur Dioxide (SO_2) emissions from the refractory reline and burners shall not exceed the limitations stated in Summary Table 8 above (Construction Permit 09PB0883). The emission factors listed above (from AP-42 1.4 & engineer estimate) have been approved by the Division and shall be used to calculate emissions from the burners, as follows:

Monthly emissions of each pollutant shall be calculated by the end of the subsequent month using the above emission factors and the monthly fuel consumption in the equation below:

Lb/mo = [CEF (lbs/MMscf) x Monthly Fuel Use (MMscf/mo)] + [CEF (lb/reline) x relines (reline/mo)]

A twelve-month rolling total of emissions will be maintained in order to monitor compliance with the annual emission limitation. By the end of each month, a new twelve-month total shall be calculated using the previous twelve months' data.

8.2 Total natural gas fuel consumption for the burners shall not exceed the limitation shown in Summary Table 8 above (Construction Permit 09PB0883). A twelve-month rolling total shall be maintained to monitor compliance with the annual limitation. By the end of each month a new twelve-month total shall be calculated using the previous twelve months' data. Monthly records of the actual fuel consumption shall be maintained and made available to the Division for inspection upon request.

The terms and conditions of this permit are based on the burners burning only natural gas. The use of any other fuel may require the permit to be re-opened prior to any use of the fuel.

8.3 Total number of ladle refractory relines shall not exceed the limitation shown in Summary Table 8 above (Construction Permit 09PB0883). A twelve-month rolling total shall be maintained to monitor compliance with the annual limitation. By the end of each month a new twelve-month total shall be calculated using the previous twelve months' data. Monthly records of the actual number of ladle refractory relines shall be maintained and made available to the Division for inspection upon request.

8.4 Current MSDS information for the material used in the ladle relining process, and documentation of the current ladle reline emission factor shall be maintained by the permit holder. The permit holder shall calculate a new ladle reline emission factor for use in the emission calculations within 60 days of any change in the specific materials used or amount of materials used (caused by ladle size change or other process modifications) that will impact air emissions. Records of the MSDS, emission factor, and associated calculations shall be maintained on site for Division review. (Construction Permit 09PB0883)

8.5 The emission limit for particulate emissions is set by the Colorado Regulation No. 1, III.A.1.b equation, $PE = 0.5(FI)^{-0.26}$ where PE is the Particulate Emission in pounds per million Btu heat input and FI is the Fuel Input in million Btu per hour.

In the absence of any credible evidence to the contrary, compliance with the limit shall be presumed since only natural gas is permitted to be used as fuel.

8.6 Except as provided in Condition 8.7 below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. (Colorado Regulation No. 1, II.A.1).

In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed since only natural gas is permitted to be used as fuel for this boiler.

8.7 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in

excess of 30% opacity for a period or periods aggregating more than six (6) minutes in any sixty (60) consecutive minutes (Colorado Regulation No. 1, Section II.A.4).

In the absence of credible evidence to the contrary, compliance with the 30% opacity limit shall be presumed since only natural gas is permitted to be used as fuel for this boiler.

9. Scrap Pile Operations (AIRS# 123)

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
Scrap Handling & Cutting	9.1	optimized torch tips, revised torch operator monitoring procedures and automated over-water torch cutting system				
Scrap Management Plan	9.2				Per Scrap Management Plan	
Fugitive Particulate Emissions	9.3	Not to exceed 20% opacity			Visual Observations	Daily
		No off-property transport			Method 9	As Required
		No nuisance conditions created				
Fugitive Particulate Emissions Control Plan	9.4				Per Fugitive Particulate Emissions Control Plan	

9.1 During scrap handling/cutting activities, ERMS shall utilize the optimized torch tips, revised torch operator monitoring procedures and automated over-water torch cutting system at all times (Compliance Order on Consent, 0005-03).

9.2 ERMS shall comply with the most recent Division-approved Scrap Management Plan which describes how the emissions of Pb and VOCs from the EAF will be minimized and how the percentage of oily scrap in each batch will be limited to 3% or less. A copy of the plan shall be kept on site and made available for Division review upon request. (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3)

9.3 A daily check of the scrap pile storage area shall be conducted to determine if visible emissions exist. Records of the observations shall be maintained and made available for Division review upon request. (NOTE: The 20% opacity, no off-property transport, and nuisance emission limitation are guidelines and not enforceable standards and no person shall be cited for violation thereof pursuant to C.R.S. 1973, 25-7-115 as amended.)

9.3.1 20% opacity - During the daily check, when visible emissions persist for longer than ten (10) continuous minutes, a Method 9 opacity observation shall be made by a person certified as a Method 9 observer to determine if the emissions are in excess of 20% opacity. Copies of all the Method 9 observations and the reader certification shall be kept on file and made available to the Division for review upon request. If 20% opacity is exceeded, the cause shall be determined and corrective actions taken. A record of the Method 9 readings, existing conditions, and the action taken shall be maintained and made available to the Division for review upon request.

9.3.2 Off-Property Transport and Nuisance Provision. During the daily check, when visible emissions exist at the scrap pile storage area and they persist for longer than ten (10) continuous minutes, an inspection shall be made to determine if the visible emissions are being transported off the property on which the source is located, or creating a nuisance. If there is off-property transport of the visible emissions, or the emissions are creating a nuisance, the cause shall be determined and corrective actions taken. A record of the existing condition and the action taken shall be maintained and made available to the Division for review upon request.

9.3.2.1 As used herein, "nuisance" shall mean the emission of fugitive particulate which constitutes a private or public nuisance as defined in common law, the essence of which is that such emissions are unreasonably interfering with another person's use and enjoyment of his property. Such interference must be "substantial" in its nature as measured by a standard that it would be of definite offensiveness, inconvenience, or annoyance to a normal person in the community.

9.3.3 If requested by the Division, a revised Control Plan shall be submitted. Sources required to submit control plans for revisions to the division shall do so within sixty days of the date such plan or revision is requested; provided, however, that the Division, in its discretion, may where appropriate establish a different time period for submittal, taking into consideration such factors as the duration of the operation of the source or activity, the significance and nature of the emissions, and the relative complexity of the operation and applicable control methods.

9.3.4 Each control plan shall include all available practical methods which are technologically feasible and economically reasonable and which reduce, prevent and control fugitive particulate emissions from the source or activity into the atmosphere. For those materials, equipment, services or other resources (such as water for abatement and control purposes) which are likely to be scarce at any given time, an alternative control method must be included in the control plan. Any source required to submit a control plan may ask for a “control plan conference” with the division, and if so requested the division shall hold such a conference for the purpose of advising what types of control measures and/or operating procedures will meet the requirements of Regulation No. 1, III.D.

9.4 ERMS shall comply with the most recent Division-approved Fugitive Particulate Emissions Control Plan. A copy of the plan shall be kept on site and made available for Division review upon request.

10. EAF Wind Erosion (AIRS# 128)

Parameter	Permit Condition Number	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
Fugitive Particulate Emissions Control Plan	10.1				Per Fugitive Particulate Emissions Control Plan	
Fugitive Particulate Emissions	10.2	Not to exceed 20% opacity			Visual Observations	Daily
		No off-property transport			Method 9	As Required
		No nuisance conditions created				

10.1 ERMS shall comply with the most recent Division-approved Fugitive Particulate Emissions Control Plan which describes how the generation of fugitive particulate matter associated with operation of the EAF will be minimized and controlled. A copy of the plan shall be kept on site and made available for Division review upon request. (Construction Permit 02PB0492 as modified under the provisions of Section I, condition 1.3)

10.2 A daily check of the EAF Wind Erosion areas shall be conducted to determine if visible emissions exist. Records of the observations shall be maintained and made available for Division review upon request. (NOTE: The 20% opacity, no off-property transport, and nuisance emission limitation are guidelines and not enforceable standards and no person shall be cited for violation thereof pursuant to C.R.S. 1973, 25-7-115 as amended.)

10.2.1 20% opacity - During the daily check, when visible emissions persist for longer than ten (10) continuous minutes, a Method 9 opacity observation shall be made by a person certified as a Method 9 observer to determine if the emissions are in excess of 20% opacity. Copies of all the Method 9 observations and the reader certification shall be kept on file and made available to the Division for review upon request. If 20% opacity is exceeded, the cause shall be determined and corrective actions taken. A record of the Method 9 readings, existing conditions, and the action taken shall be maintained and made available to the Division for review upon request.

10.2.2 Off-Property Transport and Nuisance Provision. During the daily check, when visible emissions exist at the EAF Wind Erosion areas and they persist for longer than ten (10) continuous minutes, an inspection shall be made to determine if the visible emissions are being transported off the property on which the source is located, or creating a nuisance. If there is off-property transport of the visible emissions, or the emissions are creating a nuisance, the cause shall be determined and corrective actions taken. A record of the existing condition and the action taken shall be maintained and made available to the Division for review upon request.

10.2.2.1 As used herein, "nuisance" shall mean the emission of fugitive particulate

which constitutes a private or public nuisance as defined in common law, the essence of which is that such emissions are unreasonably interfering with another person's use and enjoyment of his property. Such interference must be "substantial" in its nature as measured by a standard that it would be of definite offensiveness, inconvenience, or annoyance to a normal person in the community.

10.2.3 If requested by the Division, a revised Control Plan shall be submitted. Sources required to submit control plans for revisions to the division shall do so within sixty days of the date such plan or revision is requested; provided, however, that the Division, in its discretion, may where appropriate establish a different time period for submittal, taking into consideration such factors as the duration of the operation of the source or activity, the significance and nature of the emissions, and the relative complexity of the operation and applicable control methods.

10.2.4 Each control plan shall include all available practical methods which are technologically feasible and economically reasonable and which reduce, prevent and control fugitive particulate emissions from the source or activity into the atmosphere. For those materials, equipment, services or other resources (such as water for abatement and control purposes) which are likely to be scarce at any given time, an alternative control method must be included in the control plan. Any source required to submit a control plan may ask for a “control plan conference” with the division, and if so requested the division shall hold such a conference for the purpose of advising what types of control measures and/or operating procedures will meet the requirements of Regulation No. 1, III.D.

11. 40 CFR Part 63, Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants from Industrial, Commercial, and Institutional Boilers and Process Heaters

The requirements of Condition 11 apply only to the following equipment: Cleaver Brooks natural gas fueled Vacuum Tank Degasser Boiler– 37 mmBtu/hr (AIRS# 105)

The requirements below reflect the language in 40 CFR Part 63 Subpart DDDDD as of the date of this permit revision [October 1, 2012]. However, the permittee is subject to the latest version of Subpart DDDDD. The relevant requirements in 40 CFR Part 63 Subpart DDDD include, but are not limited to the following.

Note that EPA proposed revisions to these requirements (published in the December 23, 2011 Federal Register). Therefore, these requirements may change in the future when the proposed rule is finalized. These requirements included in this Condition 11 are only federally enforceable. As of the date of this permit revision [October 1, 2012], the requirements in 40 CFR Part 63 Subpart DDDDD have not been adopted into Colorado Regulation No. 8, Part E by the Division and are therefore not state-enforceable.

When do I have to comply with this subpart? (§ 63.7495)

11.1 If you have an existing boiler or process heater, you must comply with this subpart no later than March 21, 2014 (§63.7495(b))

11.2 You must meet the notification requirements in Condition 11.8 according to the schedule in Conditions 11.9 and 11.10 and in subpart A of 40 CFR Part 63. Some of the notifications must be submitted before you are required to comply with the emission limits and work practice standards in this subpart (§ 63.7495(d)).

What emission limitations, work practice standards, and operating limits must I meet? (§ 63.7500)

11.3 You must meet the requirements in Conditions 11.3.2 and 11.3.2, except as provided in Condition 11.3.3. You must meet these requirements at all times (§ 63.7500(a)).

11.3.1 You must meet each emission limit and work practice standard in Tables 1 through 3 to Subpart DDDDD that applies to your boiler or process heater, for each boiler or process heater at your source.

This unit is not subject to emission limits in Tables 1 or 2. The work practice standards in Table 3 that apply to this unit are:

11.3.1.1 A new or existing boiler or process heater in either the Gas 1 or Metal Process Furnace subcategory with heat input capacity of 10 million Btu per hour or greater: conduct a tune-up of the boiler or process heater annually as specified in § 63.7540. (40 CFR Part 63 Subpart DDDDD, Table 3, item 2)

11.3.1.2 An existing boiler or process heater located at a major source facility: Must have a one-time energy assessment performed on the major source facility by qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table, satisfies the energy assessment requirement (40 CFR Part 63 Subpart DDDDD, Table 3, item 3). The energy assessment must include:

a. A visual inspection of the boiler or process heater system.

b. An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints,

c. An inventory of major energy consuming systems,

d. A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,

e. A review of the facility's energy management practices and provide recommendations for improvements consistent with the definition of energy management practices,

f. A list of major energy conservation measures,

g. A list of the energy savings potential of the energy conservation measures identified, and

h. A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

11.3.2 At all times, you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (§ 63.7500(a)(3))

11.3.3 As provided in § 63.6(g), EPA may approve use of an alternative to the work practice standards in this section (§ 63.7500(b)).

When must I conduct subsequent performance tests, fuel analyses, or tune-ups? (§ 63.7515)

11.4 If you are required to meet an applicable tune-up work practice standard, you must conduct an annual or biennial performance tune-up according to Condition 11.7. Each annual tune-up specified in Condition 11.7 must be no more than 13 months after the previous tune-up. (§ 63.7515(e)).

How do I demonstrate initial compliance with the emission limitations, fuel specifications and work practice standards? (§ 63.7530)

11.5 You must include with the Notification of Compliance Status a signed certification that the energy assessment was completed according to Table 3 of Subpart DDDDD (Condition 11.3.1.2) and is an accurate depiction of your facility (§ 63.7530(e))

11.6 You must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in Condition 11.10. (§ 63.7530(f)).

How do I demonstrate continuous compliance with the emission limitations, fuel specifications and work practice standards? (§ 63.7540)

11.7 If your boiler or process heater is in either the natural gas, refinery gas, other gas 1, or Metal Process Furnace subcategories and has a heat input capacity of 10 million Btu per hour or greater, you must conduct a tune-up of the boiler or process heater annually to demonstrate continuous compliance as specified in Conditions 11.7.1 through 11.7.6. (§ 63.7540(a)(10))

11.7.1 As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 36 months);

11.7.2 Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;

11.7.3 Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly;

11.7.4 Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available;

11.7.5 Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made); and

11.7.6 Maintain on-site and submit, if requested by the Administrator, an annual report containing the following information:

11.7.6.1 The concentrations of carbon monoxide in the effluent stream in parts per million by volume, and oxygen in volume percent, measured before and after the adjustments of the boiler;

11.7.6.2 A description of any corrective actions taken as a part of the combustion adjustment; and

11.7.6.3 The type and amount of fuel used over the 12 months prior to the annual adjustment, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

11.7.7 If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup. (§ 63.7540(a)(12))

What notifications must I submit and when? (§ 63.7545)

11.8 You must submit to the Division the initial notification (§ 63.9(b)) and the notification of compliance status (§ 63.9(h)) by the dates specified. (§ 63.7545(a))

11.9 As specified in § 63.9(b)(2), if you startup your affected source before May 20, 2011, you must submit an Initial Notification not later than 120 days after May 20, 2011. (§ 63.7545(b))

11.10 If you are required to conduct an initial compliance demonstration as specified in § 63.7530(a), you must submit a Notification of Compliance Status according to § 63.9(h)(2)(ii). For the initial compliance demonstration for each affected source, you must submit the Notification of Compliance Status, including all performance test results and fuel analyses, before the close of business on the 60th day following the completion of all performance test and/or other initial compliance demonstrations for the affected source according to § 63.10(d)(2). The Notification of Compliance Status report must contain the following applicable information: (§63.7545(e))

11.10.1 A description of the affected unit(s) including identification of which subcategory the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit, description of the fuel(s) burned, including whether the fuel(s) were determined by you or EPA through a petition process to be a non-waste under § 241.3, whether the fuel(s) were processed from discarded nonhazardous secondary materials within the meaning of § 241.3, and justification for the selection of fuel(s) burned during the compliance demonstration. (§ 63.7545(e)(1))

11.10.2 A signed certification that you have met all applicable emission limits and work practice standards. (§ 63.7545(e)(6))

11.10.3 If you had a deviation from any emission limit, work practice standard, or operating limit, you must also submit a description of the deviation, the duration of the deviation, and the corrective action taken in the Notification of Compliance Status report. (§ 63.7545(e)(7))

11.10.4 In addition to the information required in § 63.9(h)(2), your notification of compliance status must include the following certification(s) of compliance, as applicable, and signed by a responsible official (§ 63.7545(e)(8)):

11.10.4.1 ‘‘This facility complies with the requirements in § 63.7540(a)(10) to conduct an annual or biennial tune-up, as applicable, of each unit.’’

11.10.4.2 ‘‘This facility has had an energy assessment performed according to § 63.7530(e).’’

11.10.4.3 Except for units that qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act, include the following: ‘‘No secondary materials that are solid waste were combusted in any affected unit.’’

What reports must I submit and when? (63.7550)

11.11 For units that are subject only to a requirement to conduct an annual tune-up according to Condition 11.7, and not subject to emission limits or operating limits, you may submit only an annual compliance report, as applicable, as specified in § 63.7550(b)(1) through (5), instead of a semiannual compliance report. (§ 63.7550(b))

11.12 The compliance report must contain the information required in § 63.7550(c)(1) through (13) (§ 63.7550(c)). The compliance report for this unit shall include the information specified in paragraphs (c)(1) - (4) and (12).

11.13 Each affected source that has obtained a Title V operating permit pursuant to part 70 or part 71 of this chapter must report all deviations as defined in this subpart in the semiannual monitoring report required by § 70.6(a)(3)(iii)(A) or § 71.6(a)(3)(iii)(A). If an affected source submits a compliance report pursuant to Table 9 to this subpart along with, or as part of, the semiannual monitoring report required by § 70.6(a)(3)(iii)(A) or § 71.6(a)(3)(iii)(A), and the compliance report includes all required information concerning deviations from any emission limit, operating limit, or work practice requirement in this subpart, submission of the compliance report satisfies any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report does not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the delegated authority. (§ 63.7550(f))

What records must I keep? (63.7555)

11.14 You must keep the following records:

11.14.1 A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual [or annual or biennial as applicable] compliance report that you submitted, according to the requirements in § 63.10(b)(2)(xiv). (§ 63.7555(a)(1))

11.14.2 Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in § 63.10(b)(2)(viii). (§ 63.7555(a)(2))

In what form and how long must I keep my records? (§ 63.7560)

11.15 Your records must be in a form suitable and readily available for expeditious review, according to § 63.10(b)(1). (§ 63.7560(a))

11.16 As specified in § 63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. (§ 63.7560(b))

11.17 You must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1). You can keep the records off site for the remaining 3 years. (§ 63.7560(c))

What parts of the General Provisions apply to me? (63.7565)

11.18 Table 10 of 40 CFR Part 63 Subpart DDDDD shows which parts of the General Provisions in §§ 63.1 through 63.15 apply to you. (§ 63.7565) These requirements include but are not limited to the following:

11.18.1 Prohibited activities in § 63.4.

11.18.2 Notification requirements in § 63.9.

SECTION III - Permit Shield

Regulation No. 3, 5 CCR 1001-5, Part C, §§ I.A.4, V.D. & XIII.B; § 25-7-114.4(3)(a), C.R.S.

1. Specific Non-Applicable Requirements

Based on the information available to the Division and supplied by the applicant, the following parameters and requirements have been specifically identified as non-applicable to the facility to which this permit has been issued. This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance. In addition, this shield does not protect the source from any violations that occur as a result of any modifications or reconstruction on which construction commenced prior to permit issuance.

Emission Unit Description & Number	Applicable Requirement	Justification
Plant-wide	Title V, Section IV, General Condition 30, Wood burning Stoves and Appliances	The permittee does not advertise, sell, install or use wood burning stoves or appliances.

2. General Conditions

Compliance with this Operating Permit shall be deemed compliance with all applicable requirements specifically identified in the permit and other requirements specifically identified in the permit as not applicable to the source. This permit shield shall not alter or affect the following:

2.1 The provisions of §§ 25-7-112 and 25-7-113, C.R.S., or § 303 of the federal act, concerning enforcement in cases of emergency;

2.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

2.3 The applicable requirements of the federal Acid Rain Program, consistent with § 408(a) of the federal act;

2.4 The ability of the Air Pollution Control Division to obtain information from a source pursuant to § 25-7-111(2)(I), C.R.S., or the ability of the Administrator to obtain information pursuant to § 114 of the federal act;

2.5 The ability of the Air Pollution Control Division to reopen the Operating Permit for cause pursuant to Regulation No. 3, Part C, § XIII.

2.6 Sources are not shielded from terms and conditions that become applicable to the source subsequent to permit issuance.

3. Stream-lined Conditions

The following applicable requirements have been subsumed within this operating permit using the pertinent streamlining procedures approved by the U.S. EPA. For purposes of the permit shield, compliance with the listed permit conditions will also serve as a compliance demonstration for purposes of the associated subsumed requirements.

No conditions have been streamlined.

SECTION IV - General Permit Conditions ver 5/22/2012

1. Administrative Changes

Regulation No. 3, 5 CCR 1001-5, Part A, § III.

The permittee shall submit an application for an administrative permit amendment to the Division for those permit changes that are described in Regulation No. 3, Part A, § I.B.1. The permittee may immediately make the change upon submission of the application to the Division.

2. Certification Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.9., V.C.16.a.& e. and V.C.17.

a. Any application, report, document and compliance certification submitted to the Air Pollution Control Division pursuant to Regulation No. 3 or the Operating Permit shall contain a certification by a responsible official of the truth, accuracy and completeness of such form, report or certification stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

b. All compliance certifications for terms and conditions in the Operating Permit shall be submitted to the Air Pollution Control Division at least annually unless a more frequent period is specified in the applicable requirement or by the Division in the Operating Permit.

c. Compliance certifications shall contain:

(i) the identification of each permit term and condition that is the basis of the certification;

(ii) the compliance status of the source;

(iii) whether compliance was continuous or intermittent;

(iv) method(s) used for determining the compliance status of the source, currently and over the reporting period; and

(v) such other facts as the Air Pollution Control Division may require to determine the compliance status of the source.

d. All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.

e. If the permittee is required to develop and register a risk management plan pursuant to § 112(r) of the federal act, the permittee shall certify its compliance with that requirement; the Operating Permit shall not incorporate the contents of the risk management plan as a permit term or condition.

3. Common Provisions

Common Provisions Regulation, 5 CCR 1001-2 §§ II.A., II.B., II.C., II.E., II.F., II.I, and II.J

a. To Control Emissions Leaving Colorado

When emissions generated from sources in Colorado cross the State boundary line, such emissions shall not cause the air quality standards of the receiving State to be exceeded, provided reciprocal action is taken by the receiving State.

b. Emission Monitoring Requirements

The Division may require owners or operators of stationary air pollution sources to install, maintain, and use instrumentation to monitor and record emission data as a basis for periodic reports to the Division.

c. Performance Testing

The owner or operator of any air pollution source shall, upon request of the Division, conduct performance test(s) and furnish the Division a written report of the results of such test(s) in order to determine compliance with applicable emission control regulations.

Performance test(s) shall be conducted and the data reduced in accordance with the applicable reference test methods unless the Division:

(i) specifies or approves, in specific cases, the use of a test method with minor changes in methodology;

(ii) approves the use of an equivalent method;

(iii) approves the use of an alternative method the results of which the Division has determined to be adequate for indicating where a specific source is in compliance; or

(iv) waives the requirement for performance test(s) because the owner or operator of a source has demonstrated by other means to the Division's satisfaction that the affected facility is in compliance with the standard. Nothing in this paragraph shall be construed to abrogate the Commission's or Division's authority to require testing under the Colorado Revised Statutes, Title 25, Article 7, and pursuant to regulations promulgated by the Commission.

Compliance test(s) shall be conducted under such conditions as the Division shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Division such records as may be necessary to determine the conditions of the performance test(s). Operations during period of startup, shutdown, and malfunction shall not constitute representative conditions of performance test(s) unless otherwise specified in the applicable standard.

The owner or operator of an affected facility shall provide the Division thirty days prior notice of the performance test to afford the Division the opportunity to have an observer present. The Division may waive the thirty day notice requirement provided that arrangements satisfactory to the Division are made for earlier testing.

The owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:

(i) Sampling ports adequate for test methods applicable to such facility;

(ii) Safe sampling platform(s);

(iii) Safe access to sampling platform(s); and

(iv) Utilities for sampling and testing equipment.

Each performance test shall consist of at least three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic mean of results of at least three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the owner or operator's control, compliance may, upon the Division's approval, be determined using the arithmetic mean of the results of the two other runs.

Nothing in this section shall abrogate the Division's authority to conduct its own performance test(s) if so warranted.

d. Affirmative Defense Provision for Excess Emissions during Malfunctions

An affirmative defense to a claim of violation under these regulations is provided to owners and operators for civil penalty actions for excess emissions during periods of malfunction. To establish the affirmative defense and to be relieved of a civil penalty in any action to enforce an applicable requirement, the owner or operator of the facility must meet the notification requirements below in a timely manner and prove by a preponderance of evidence that:

(i) The excess emissions were caused by a sudden, unavoidable breakdown of equipment, or a sudden, unavoidable failure of a process to operate in the normal or usual manner, beyond the reasonable control of the owner or operator;

(ii) The excess emissions did not stem from any activity or event that could have reasonably been foreseen and avoided, or planned for, and could not have been avoided by better operation and maintenance practices;

(iii) Repairs were made as expeditiously as possible when the applicable emission limitations were being exceeded;

(iv) The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent practicable during periods of such emissions;

(v) All reasonably possible steps were taken to minimize the impact of the excess emissions on ambient air quality;

(vi) All emissions monitoring systems were kept in operation (if at all possible);

(vii) The owner or operator's actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence;

(viii) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;

(ix) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This section is intended solely to be a factor in determining whether an affirmative defense is available to an owner or operator, and shall not constitute an additional applicable requirement; and

(x) During the period of excess emissions, there were no exceedances of the relevant ambient air quality standards established in the Commissions' Regulations that could be attributed to the emitting source.

The owner or operator of the facility experiencing excess emissions during a malfunction shall notify the division verbally as soon as possible, but no later than noon of the Division's next working day, and shall submit written notification following the initial occurrence of the excess emissions by the end of the source's next reporting period. The notification shall address the criteria set forth above.

The Affirmative Defense Provision contained in this section shall not be available to claims for injunctive relief.

The Affirmative Defense Provision does not apply to failures to meet federally promulgated performance standards or emission limits, including, but not limited to, new source performance standards and national emission standards for hazardous air pollutants. The affirmative defense provision does not apply to state implementation plan (sip) limits or permit limits that have been set taking into account potential emissions during malfunctions, including, but not necessarily limited to, certain limits with 30-day or longer averaging times, limits that indicate they apply during malfunctions, and limits that indicate they apply at all times or without exception.

e. Circumvention Clause

A person shall not build, erect, install, or use any article, machine, equipment, condition, or any contrivance, the use of which, without resulting in a reduction in the total release of air pollutants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of this regulation. No person shall circumvent this regulation by using more openings than is considered normal practice by the industry or activity in question.

f. Compliance Certifications

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in the Colorado State Implementation Plan, nothing in the Colorado State Implementation Plan shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. Evidence that has the effect of making any relevant standard or permit term more stringent shall not be credible for proving a violation of the standard or permit term.

When compliance or non-compliance is demonstrated by a test or procedure provided by permit or other applicable requirement, the owner or operator shall be presumed to be in compliance or non-compliance unless other relevant credible evidence overcomes that presumption.

g. Affirmative Defense Provision for Excess Emissions During Startup and Shutdown

An affirmative defense is provided to owners and operators for civil penalty actions for excess emissions during periods of startup and shutdown. To establish the affirmative defense and to be relieved of a civil penalty in any action to enforce an applicable requirement, the owner or operator of the facility must meet the notification requirements below in a timely manner and prove by a preponderance of the evidence that:

(i) The periods of excess emissions that occurred during startup and shutdown were short and infrequent and could not have been prevented through careful planning and design;

(ii) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation or maintenance;

(iii) If the excess emissions were caused by a bypass (an intentional diversion of control equipment), then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(iv) The frequency and duration of operation in startup and shutdown periods were minimized to the maximum extent practicable;

(v) All possible steps were taken to minimize the impact of excess emissions on ambient air quality;

(vi) All emissions monitoring systems were kept in operation (if at all possible);

(vii) The owner or operator's actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence; and,

(viii) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This subparagraph is intended solely to be a factor in determining whether an affirmative defense is available to an owner or operator, and shall not constitute an additional applicable requirement.

The owner or operator of the facility experiencing excess emissions during startup and shutdown shall notify the Division verbally as soon as possible, but no later than two (2) hours after the start of the next working day, and shall submit written quarterly notification following the initial occurrence of the excess emissions. The notification shall address the criteria set forth above.

The Affirmative Defense Provision contained in this section shall not be available to claims for injunctive relief.

The Affirmative Defense Provision does not apply to State Implementation Plan provisions or other requirements that derive from new source performance standards or national emissions standards for hazardous air pollutants, or any other federally enforceable performance standard or emission limit with an averaging time greater than twenty-four hours. In addition, an affirmative defense cannot be used by a single source or small group of sources where the excess emissions have the potential to cause an exceedance of the ambient air quality standards or Prevention of Significant Deterioration (PSD) increments.

In making any determination whether a source established an affirmative defense, the Division shall consider the information within the notification required above and any other information the Division deems necessary, which may include, but is not limited to, physical inspection of the facility and review of documentation pertaining to the maintenance and operation of process and air pollution control equipment.

4. Compliance Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.C.9., V.C.11. & 16.d. and § 25-7-122.1(2), C.R.S.

a. The permittee must comply with all conditions of the Operating Permit. Any permit noncompliance relating to federally-enforceable terms or conditions constitutes a violation of the federal act, as well as the state act and Regulation No. 3. Any permit noncompliance relating to state-only terms or conditions constitutes a violation of the state act and Regulation No. 3, shall be enforceable pursuant to state law, and shall not be enforceable by citizens under § 304 of the federal act. Any such violation of the federal act, the state act or regulations implementing either statute is grounds for enforcement action, for permit termination, revocation and reissuance or modification or for denial of a permit renewal application.

b. It shall not be a defense for a permittee in an enforcement action or a consideration in favor of a permittee in a permit termination, revocation or modification action or action denying a permit renewal application that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

c. The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of any request by the permittee for a permit modification, revocation and reissuance, or termination, or any notification of planned changes or anticipated noncompliance does not stay any permit condition, except as provided in §§ X. and XI. of Regulation No. 3, Part C.

d. The permittee shall furnish to the Air Pollution Control Division, within a reasonable time as specified by the Division, any information that the Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Division copies of records required to be kept by the permittee, including information claimed to be confidential. Any information subject to a claim of confidentiality shall be specifically identified and submitted separately from information not subject to the claim.

e. Any schedule for compliance for applicable requirements with which the source is not in compliance at the time of permit issuance shall be supplemental, and shall not sanction noncompliance with, the applicable requirements on which it is based.

f. For any compliance schedule for applicable requirements with which the source is not in compliance at the time of permit issuance, the permittee shall submit, at least every 6 months unless a more frequent period is specified in the applicable requirement or by the Air Pollution Control Division, progress reports which contain the following:

(i) dates for achieving the activities, milestones, or compliance required in the schedule for compliance, and dates when such activities, milestones, or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

g. The permittee shall not knowingly falsify, tamper with, or render inaccurate any monitoring device or method required to be maintained or followed under the terms and conditions of the Operating Permit.

5. Emergency Provisions

Regulation No. 3, 5 CCR 1001-5, Part C, § VII.E

An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed the technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. "Emergency" does not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. An emergency constitutes an affirmative defense to an enforcement action brought for noncompliance with a technology-based emission limitation if the permittee demonstrates, through properly signed, contemporaneous operating logs, or other relevant evidence that:

a. an emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. the permitted facility was at the time being properly operated;

c. during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

d. the permittee submitted oral notice of the emergency to the Air Pollution Control Division no later than noon of the next working day following the emergency, and followed by written notice within one month of the time when emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

This emergency provision is in addition to any emergency or malfunction provision contained in any applicable requirement.

6. Emission Controls for Asbestos

Regulation No. 8, 5 CCR 1001-10, Part B

The permittee shall not conduct any asbestos abatement activities except in accordance with the provisions of Regulation No. 8, Part B, “asbestos control.”

7. Emissions Trading, Marketable Permits, Economic Incentives

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.13.

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are specifically provided for in the permit.

8. Fee Payment

C.R.S §§ 25-7-114.1(6) and 25-7-114.7

a. The permittee shall pay an annual emissions fee in accordance with the provisions of C.R.S. § 25-7-114.7. A 1% per month late payment fee shall be assessed against any invoice amounts not paid in full on the 91st day after the date of invoice, unless a permittee has filed a timely protest to the invoice amount.

b. The permittee shall pay a permit processing fee in accordance with the provisions of C.R.S. § 25-7-114.7. If the Division estimates that processing of the permit will take more than 30 hours, it will notify the permittee of its estimate of what the actual charges may be prior to commencing any work exceeding the 30 hour limit.

c. The permittee shall pay an APEN fee in accordance with the provisions of C.R.S. § 25-7-114.1(6) for each APEN or revised APEN filed.

9. Fugitive Particulate Emissions

Regulation No. 1, 5 CCR 1001-3, § III.D.1.

The permittee shall employ such control measures and operating procedures as are necessary to minimize fugitive particulate emissions into the atmosphere, in accordance with the provisions of Regulation No. 1, § III.D.1.

10. Inspection and Entry

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.16.b.

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Air Pollution Control Division, or any authorized representative, to perform the following:

a. enter upon the permittee's premises where an Operating Permit source is located, or emissions-related activity is conducted, or where records must be kept under the terms of the permit;

b. have access to, and copy, at reasonable times, any records that must be kept under the conditions of the permit;

c. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Operating Permit;

d. sample or monitor at reasonable times, for the purposes of assuring compliance with the Operating Permit or applicable requirements, any substances or parameters.

11. Minor Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, §§ X. & XI.

The permittee shall submit an application for a minor permit modification before making the change requested in the application. The permit shield shall not extend to minor permit modifications.

12. New Source Review

Regulation No. 3, 5 CCR 1001-5, Part B

The permittee shall not commence construction or modification of a source required to be reviewed under the New Source Review provisions of Regulation No. 3, Part B, without first receiving a construction permit.

13. No Property Rights Conveyed

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.11.d.

This permit does not convey any property rights of any sort, or any exclusive privilege.

14. Odor

Regulation No. 2, 5 CCR 1001-4, Part A

As a matter of state law only, the permittee shall comply with the provisions of Regulation No. 2 concerning odorous emissions.

15. Off-Permit Changes to the Source

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.B.

The permittee shall record any off-permit change to the source that causes the emissions of a regulated pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from the change, including any other data necessary to show compliance with applicable ambient air quality standards. The permittee shall provide contemporaneous notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permit shield shall not apply to any off-permit change.

16. Opacity

Regulation No. 1, 5 CCR 1001-3, §§ I., II.

The permittee shall comply with the opacity emissions limitation set forth in Regulation No. 1, §§ I.- II.

17. Open Burning

Regulation No. 9, 5 CCR 1001-11

The permittee shall obtain a permit from the Division for any regulated open burning activities in accordance with provisions of Regulation No. 9.

18. Ozone Depleting Compounds

Regulation No. 15, 5 CCR 1001-17

The permittee shall comply with the provisions of Regulation No. 15 concerning emissions of ozone depleting compounds. Sections I., II.C., II.D., III. IV., and V. of Regulation No. 15 shall be enforced as a matter of state law only.

19. Permit Expiration and Renewal

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.6., IV.C., V.C.2.

a. The permit term shall be five (5) years. The permit shall expire at the end of its term. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted.

b. Applications for renewal shall be submitted at least twelve months, but not more than 18 months, prior to the expiration of the Operating Permit. An application for permit renewal may address only those portions of the permit that require revision, supplementing, or deletion, incorporating the remaining permit terms by reference from the previous permit. A copy of any materials incorporated by reference must be included with the application.

20. Portable Sources

Regulation No. 3, 5 CCR 1001-5, Part C, § II.D.

Portable Source permittees shall notify the Air Pollution Control Division at least 10 days in advance of each change in location.

21. Prompt Deviation Reporting

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.7.b.

The permittee shall promptly report any deviation from permit requirements, including those attributable to malfunction conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken.

"Prompt" is defined as follows:

a. Any definition of "prompt" or a specific timeframe for reporting deviations provided in an underlying applicable requirement as identified in this permit; or

b. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:

(i) For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence;

(ii) For emissions of any regulated air pollutant, excluding a hazardous air pollutant or a toxic air pollutant that continue for more than two hours in excess of permit requirements, the report shall be made within 48 hours; and

(iii) For all other deviations from permit requirements, the report shall be submitted every six (6) months, except as otherwise specified by the Division in the permit in accordance with paragraph 22.d. below.

c. If any of the conditions in paragraphs b.i or b.ii above are met, the source shall notify the Division by telephone (303-692-3155) or facsimile (303-782-0278) based on the timetables listed above. *[Explanatory note: Notification by telephone or facsimile must specify that this notification is a deviation report for an Operating Permit.]* A written notice, certified consistent with General Condition 2.a. above (Certification Requirements), shall be submitted within 10 working days of the occurrence. All deviations reported under this section shall also be identified in the 6-month report required above.

"Prompt reporting" does not constitute an exception to the requirements of "Emergency Provisions" for the purpose of avoiding enforcement actions.

22. Record Keeping and Reporting Requirements

Regulation No. 3, 5 CCR 1001-5, Part A, § II.; Part C, §§ V.C.6., V.C.7.

a. Unless otherwise provided in the source specific conditions of this Operating Permit, the permittee shall maintain compliance monitoring records that include the following information:

(i) date, place as defined in the Operating Permit, and time of sampling or measurements;

(ii) date(s) on which analyses were performed;

(iii) the company or entity that performed the analysis;

(iv) the analytical techniques or methods used;

(v) the results of such analysis; and

(vi) the operating conditions at the time of sampling or measurement.

b. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information, for this purpose, includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Operating Permit. With prior approval of the Air Pollution Control Division, the permittee may maintain any of the above records in a computerized form.

c. Permittees must retain records of all required monitoring data and support information for the most recent twelve (12) month period, as well as compliance certifications for the past five (5) years on-site at all times. A permittee shall make available for the Air Pollution Control Division's review all other records of required monitoring data and support information required to be retained by the permittee upon 48 hours advance notice by the Division.

d. The permittee shall submit to the Air Pollution Control Division all reports of any required monitoring at least every six (6) months, unless an applicable requirement, the compliance assurance monitoring rule, or the Division requires submission on a more frequent basis. All instances of deviations from any permit requirements must be clearly identified in such reports.

e. The permittee shall file an Air Pollutant Emissions Notice ("APEN") prior to constructing, modifying, or altering any facility, process, activity which constitutes a stationary source from which air pollutants are or are to be emitted, unless such source is exempt from the APEN filing requirements of Regulation No. 3, Part A, § II.D. A revised APEN shall be filed annually whenever a significant change in emissions, as defined in Regulation No. 3, Part A, § II.C.2., occurs; whenever there is a change in owner or operator of any facility, process, or activity; whenever new control equipment is installed; whenever a different type of control equipment replaces an existing type of control equipment; whenever a permit limitation must be modified; or before the APEN expires. An APEN is valid for a period of five years. The five-year period recommences when a revised APEN is received by the Air Pollution Control Division. Revised APENs shall be submitted no later than 30 days before the five-year term expires. Permittees submitting revised APENs to inform the Division of a change in actual emission rates must do so by April 30 of the following year. Where a permit revision is required, the revised APEN must be filed along with a request for permit revision. APENs for changes in control equipment must be submitted before the change occurs. Annual fees are based on the most recent APEN on file with the Division.

23. Reopenings for Cause

Regulation No. 3, 5 CCR 1001-5, Part C, § XIII.

a. The Air Pollution Control Division shall reopen, revise, and reissue Operating Permits; permit reopenings and reissuance shall be processed using the procedures set forth in Regulation No. 3, Part C, § III., except that proceedings to reopen and reissue permits affect only those parts of the permit for which cause to reopen exists.

b. The Division shall reopen a permit whenever additional applicable requirements become applicable to a major source with a remaining permit term of three or more years, unless the effective date of the requirements is later than the date on which the permit expires, or unless a general permit is obtained to address the new requirements; whenever additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program; whenever the Division determines the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or whenever the Division determines that the permit must be revised or revoked to assure compliance with an applicable requirement.

c. The Division shall provide 30 days' advance notice to the permittee of its intent to reopen the permit, except that a shorter notice may be provided in the case of an emergency.

d. The permit shield shall extend to those parts of the permit that have been changed pursuant to the reopening and reissuance procedure.

24. Section 502(b)(10) Changes

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.A.

The permittee shall provide a minimum 7-day advance notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permittee shall attach a copy of each such notice given to its Operating Permit.

25. Severability Clause

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.10.

In the event of a challenge to any portion of the permit, all emissions limits, specific and general conditions, monitoring, record keeping and reporting requirements of the permit, except those being challenged, remain valid and enforceable.

26. Significant Permit Modifications

Regulation No. 3, 5 CCR 1001-5, Part C, § III.B.2.

The permittee shall not make a significant modification required to be reviewed under Regulation No. 3, Part B ("Construction Permit" requirements) without first receiving a construction permit. The permittee shall submit a complete Operating Permit application or application for an Operating Permit revision for any new or modified source within twelve months of commencing operation, to the address listed in Item 1 in Appendix D of this permit. If the permittee chooses to use the "Combined Construction/Operating Permit" application procedures of Regulation No. 3, Part C, then the Operating Permit must be received prior to commencing construction of the new or modified source.

27. Special Provisions Concerning the Acid Rain Program

Regulation No. 3, 5 CCR 1001-5, Part C, §§ V.C.1.b. & 8

a. Where an applicable requirement of the federal act is more stringent than an applicable requirement of regulations promulgated under Title IV of the federal act, 40 Code of Federal Regulations (CFR) Part 72, both provisions shall be incorporated into the permit and shall be federally enforceable.

b. Emissions exceeding any allowances that the source lawfully holds under Title IV of the federal act or the regulations promulgated thereunder, 40 CFR Part 72, are expressly prohibited.

28. Transfer or Assignment of Ownership

Regulation No. 3, 5 CCR 1001-5, Part C, § II.C.

No transfer or assignment of ownership of the Operating Permit source will be effective unless the prospective owner or operator applies to the Air Pollution Control Division on Division-supplied Administrative Permit Amendment forms, for reissuance of the existing Operating Permit. No administrative permit shall be complete until a written agreement containing a specific date for transfer of permit, responsibility, coverage, and liability between the permittee and the prospective owner or operator has been submitted to the Division.

29. Volatile Organic Compounds

Regulation No. 7, 5 CCR 1001-9, §§ III & V.

The requirements in paragraphs a, b and e apply to sources located in an ozone non-attainment area or the Denver 1-hour ozone attainment/maintenance area. The requirements in paragraphs c and d apply statewide.

a. All storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.

   Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. When an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 ppm. Testing shall be conducted as in Regulation No. 7, Section VIII.C.3.

b. Except when otherwise provided by Regulation No. 7, all volatile organic compounds, excluding petroleum liquids, transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be

transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.

c. The permittee shall not dispose of volatile organic compounds by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized.

d. No owner or operator of a bulk gasoline terminal, bulk gasoline plant, or gasoline dispensing facility as defined in Colorado Regulation No. 7, Section VI, shall permit gasoline to be intentionally spilled, discarded in sewers, stored in open containers, or disposed of in any other manner that would result in evaporation.

e. Beer production and associated beer container storage and transfer operations involving volatile organic compounds with a true vapor pressure of less than 1.5 PSIA actual conditions are exempt from the provisions of paragraph b, above.

30. Wood Stoves and Wood burning Appliances

Regulation No. 4, 5 CCR 1001-6

The permittee shall comply with the provisions of Regulation No. 4 concerning the advertisement, sale, installation, and use of wood stoves and wood burning appliances.

OPERATING PERMIT APPENDICES

A - INSPECTION INFORMATION
B - MONITORING AND PERMIT DEVIATION REPORT
C - COMPLIANCE CERTIFICATION REPORT
D - NOTIFICATION ADDRESSES
E - PERMIT ACRONYMS
F - PERMIT MODIFICATIONS
G - COMPLIANCE ASSURANCE MONITORING PLAN: EAF
H - COMPLIANCE ASSURANCE MONITORING PLAN: LRF
I - PARAMETRIC MONITORING PLAN
J - SCRAP MANAGEMENT PLAN
K - FUGITIVE PARTICULATE EMISSIONS CONTROL PLAN
L – AUDIT PLAN

*DISCLAIMER:

None of the information found in these Appendices shall be considered to be State or Federally enforceable, except as otherwise provided in the permit, and is presented to assist the source, permitting authority, inspectors, and citizens.

APPENDIX A

Inspection Information

Directions to Plant:

The plant site is located at 2100 South Freeway in Pueblo. The entrance is near I-25 and Indiana.

Safety Equipment Required:

Eye Protection, Hard Hat, Safety Shoes, Hearing Protection.
Must be accompanied by Rocky Mountain Steel Mill employee.

Facility Plot Plan:

The following figures show the map and plot plan as submitted on December 1, 2005, with the source's Title V Operating Permit renewal application.

List of Insignificant Activities:

The following list of insignificant activities was provided by the source to assist in the understanding of the facility layout. Since there is no requirement to update such a list, activities may have changed since the last filing.

Each individual piece of fuel burning equipment, other than smokehouse generators and internal combustion engines, which uses gaseous fuel, and which has a design rate less than or equal to 5 million Btu per hour. (See definition of fuel burning equipment, Common Provisions Regulation).

Each individual piece of fuel burning equipment that uses gaseous fuel, and that has a design rate less than or equal to ten million British thermal units per hour, and that is used solely for heating buildings for personal comfort.

Specific insignificant activities and/or sources of emissions identified in the application are as follows:

Fuel Burning Equipment:
There are 35 to 45 miscellaneous heaters located in and around the Steelmaking mill. The heaters range in size from 0.02 to 0.25 MMBtu/Hr.

Emissions Less Than APEN Reporting Threshold

Slag removal, storage of HBI (briquetted iron), and bucket loading
The emissions are estimated to be less than 2.0 tons per year based on experience and knowledge of other plant operations.

Flux Hoppers
Considered to be an insignificant source based on estimated actual annual uncontrolled emissions of 134 pounds per year. The estimate is based on 74,441 tons per year of matierials charged, and an

emission factor of 1.80e-3 pounds per ton. The estimated emissions are futher reduced when allowing for some control efficiency for operating inside and enclosure.

Baghouse Dust Handling

Considered to be insignificant based on estimated actual annual uncontrolled emissions of 1.65 tons per year. The estimate is based on handling 19,469 tons per year of baghouse dust, and an emission factor of 0.17 pounds per ton. The estimated emissions are further reduced when allowing for some control efficiency in handling the dust. The permitte will need to be mindful that additional sources or improved control efficiencies on existing sources could increase the annual baghouse dust to be handled to a level where the handling emissions are no longer insignificant.

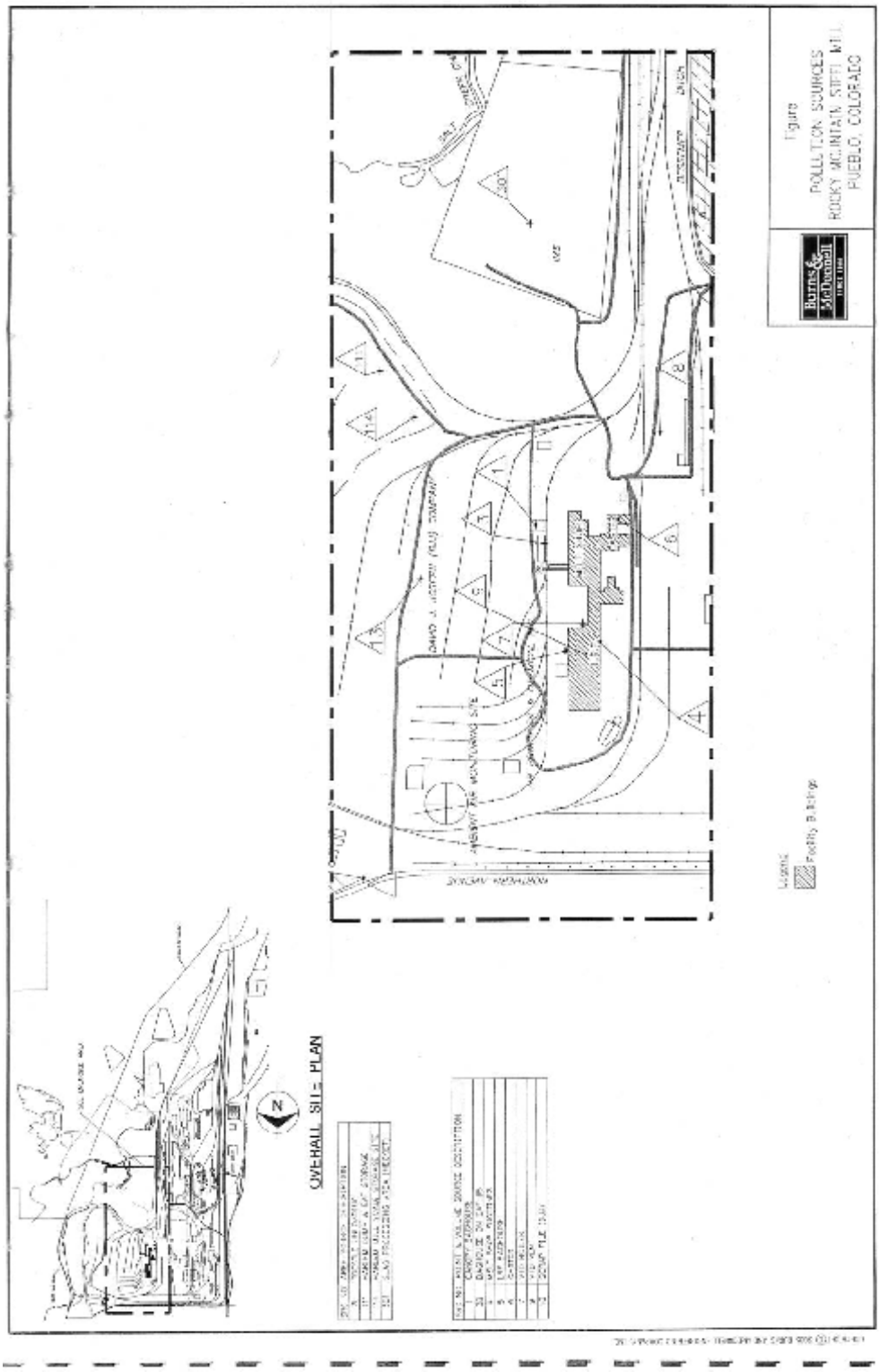


Figure
POLLUTION SOURCES
ROCKY MOUNTAIN STEEL MILL
PUEBLO, COLORADO
Burns & McDonnell
OVERALL SITE PLAN

APPENDIX B

Reporting Requirements and Definitions

with codes ver 2/20/07

Please note that, pursuant to 113(c)(2) of the federal Clean Air Act, any person who knowingly:

(A) makes any false material statement, representation, or certification in, or omits material information from, or knowingly alters, conceals, or fails to file or maintain any notice, application, record, report, plan, or other document required pursuant to the Act to be either filed or maintained (whether with respect to the requirements imposed by the Administrator or by a State);

(B) fails to notify or report as required under the Act; or

(C) falsifies, tampers with, renders inaccurate, or fails to install any monitoring device or method required to be maintained or followed under the Act shall, upon conviction, be punished by a fine pursuant to title 18 of the United States Code, or by imprisonment for not more than 2 years, or both. If a conviction of any person under this paragraph is for a violation committed after a first conviction of such person under this paragraph, the maximum punishment shall be doubled with respect to both the fine and imprisonment.

The permittee must comply with all conditions of this operating permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

The Part 70 Operating Permit program requires three types of reports to be filed for all permits.
All required reports must be certified by a responsible official.

Report #1: Monitoring Deviation Report (due at least every six months)

For purposes of this operating permit, the Division is requiring that the monitoring reports are due every six months unless otherwise noted in the permit. All instances of deviations from permit monitoring requirements must be clearly identified in such reports.

For purposes of this operating permit, monitoring means any condition determined by observation, by data from any monitoring protocol, or by any other monitoring which is required by the permit as well as the recordkeeping associated with that monitoring. This would include, for example, fuel use or process rate monitoring, fuel analyses, and operational or control device parameter monitoring.

Report #2: Permit Deviation Report (must be reported "promptly")

In addition to the monitoring requirements set forth in the permits as discussed above, each and every requirement of the permit is subject to deviation reporting. The reports must address deviations from permit requirements, including those attributable to malfunctions as defined in this Appendix, the probable cause of

such deviations, and any corrective actions or preventive measures taken. All deviations from any term or condition of the permit are required to be summarized or referenced in the annual compliance certification.

For purposes of this operating permit, "malfunction" shall refer to both emergency conditions and malfunctions. Additional discussion on these conditions is provided later in this Appendix.

For purposes of this operating permit, the Division is requiring that the permit deviation reports are due as set forth in General Condition 21. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. For example, quarterly Excess Emission Reports required by an NSPS or Regulation No. 1, Section IV.

In addition to the monitoring deviations discussed above, included in the meaning of deviation for the purposes of this operating permit are any of the following:

(1) A situation where emissions exceed an emission limitation or standard contained in the permit;

(2) A situation where process or control device parameter values demonstrate that an emission limitation or standard contained in the permit has not been met;

(3) A situation in which observations or data collected demonstrates noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit; or,

(4) A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only if the emission point is subject to CAM)

For reporting purposes, the Division has combined the Monitoring Deviation Report with the Permit Deviation Report. All deviations shall be reported using the following codes:

1 = Standard:	When the requirement is an emission limit or standard
2 = Process:	When the requirement is a production/process limit
3 = Monitor:	When the requirement is monitoring
4 = Test:	When the requirement is testing
5 = Maintenance:	When required maintenance is not performed
6 = Record:	When the requirement is recordkeeping
7 = Report:	When the requirement is reporting
8 = CAM:	A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.
9 = Other:	When the deviation is not covered by any of the above categories

Report #3: Compliance Certification (annually, as defined in the permit)

Submission of compliance certifications with terms and conditions in the permit, including emission limitations, standards, or work practices, is required not less than annually.

Compliance Certifications are intended to state the compliance status of each requirement of the permit over the certification period. They must be based, at a minimum, on the testing and monitoring methods specified in the permit that were conducted during the relevant time period. In addition, if the owner or operator knows of other material information (i.e. information beyond required monitoring that has been specifically assessed in relation to how the information potentially affects compliance status), that information must be identified and addressed in the compliance certification. The compliance certification must include the following:

- The identification of each term or condition of the permit that is the basis of the certification;

- Whether or not the method(s) used by the owner or operator for determining the compliance status with each permit term and condition during the certification period was the method(s) specified in the permit. Such methods and other means shall include, at a minimum, the methods and means required in the permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Clean Air Act, which prohibits knowingly making a false certification or omitting material information;

- The status of compliance with the terms and conditions of the permit, and whether compliance was continuous or intermittent. The certification shall identify each deviation and take it into account in the compliance certification. Note that not all deviations are considered violations.[1]

- Such other facts as the Division may require, consistent with the applicable requirements to which the source is subject, to determine the compliance status of the source.

The Certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only for emission points subject to CAM)

Note the requirement that the certification shall identify each deviation and take it into account in the compliance certification. Previously submitted deviation reports, including the deviation report submitted at the time of the annual certification, may be referenced in the compliance certification.

[1] For example, given the various emissions limitations and monitoring requirements to which a source may be subject, a deviation from one requirement may not be a deviation under another requirement which recognizes an exception and/or special circumstances relating to that same event.

Startup, Shutdown, Malfunctions and Emergencies,

Understanding the application of Startup, Shutdown, Malfunctions and Emergency Provisions, is very important in both the deviation reports and the annual compliance certifications.

Startup, Shutdown, and Malfunctions

Please note that exceedances of some New Source Performance Standards (NSPS) and Maximum Achievable Control Technology (MACT) standards that occur during Startup, Shutdown or Malfunctions may not be considered to be non-compliance since emission limits or standards often do not apply unless specifically stated in the NSPS. Such exceedances must, however, be reported as excess emissions per the NSPS/MACT rules and would still be noted in the deviation report. In regard to compliance certifications, the permittee should be confident of the information related to those deviations when making compliance determinations since they are subject to Division review. The concepts of Startup, Shutdown and Malfunctions also exist for Best Available Control Technology (BACT) sources, but are not applied in the same fashion as for NSPS and MACT sources.

Emergency Provisions

Under the Emergency provisions of Part 70 certain operational conditions may act as an affirmative defense against enforcement action if they are properly reported.

DEFINITIONS

Malfunction (NSPS) means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

Malfunction (SIP) means any sudden and unavoidable failure of air pollution control equipment or process equipment or unintended failure of a process to operate in a normal or usual manner. Failures that are primarily caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

Emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

APPENDIX B: Monitoring and Permit Deviation Report - Part I

1. Following is the **required** format for the Monitoring and Permit Deviation report to be submitted to the Division as set forth in General Condition 21. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

2. Part II of this Appendix B shows the format and information the Division will require for describing periods of monitoring and permit deviations, or malfunction or emergency conditions as indicated in the Table below. One Part II Form must be completed for each Deviation. Previously submitted reports (e.g. EER's or malfunctions) may be referenced and the form need not be filled out in its entirety.

FACILITY NAME: Rocky Mountain Steel Mills – Steelmaking
OPERATING PERMIT NO: 95OPPB097
REPORTING PERIOD:_____ (see first page of the permit for specific reporting period and dates)

Operating Permit Unit ID	Unit Description	Deviations noted During Period?[1]		Deviation Code [2]	Malfunction/Emergency Condition Reported During Period?	
		YES	NO		YES	NO
114 & 129	Electric Arc Furnace (EAF) #5, model ACEAF-150-KP-EOEBT, s/n: 90156.ROC.SE.21, with two baghouses (canopy & 4th hole).					
039	Mannesman Demag custom built Round Caster with natural gas fired cutting torches and tundish preheater.					
110	Ladle Metallurgy Station with Amerex 50 RP-14-1040 baghouse.					
106	Vacuum Tank Degasser vent					
105	Cleaver Brooks, model CBL-700-4500-900, s/n: OLD 92860, natural gas fueled Vacuum Tank Degasser Boiler.					
112	Trestle Off-Loading of rail cars transporting flux materials.					
122	Ladle Preheat Burners (five stations).					
123	Scrap pile operations.					
125	Reline Ladle Refractory Process, including the use of binder material, refractory brick, and natural gas fueled burners.					
128	EAF wind erosion.					
General Conditions						

Operating Permit Unit ID	Unit Description	Deviations noted During Period?[1]		Deviation Code [2]	Malfunction/Emergency Condition Reported During Period?	
		YES	NO		YES	NO
Insignificant Activities						

[1] See previous discussion regarding what is considered to be a deviation. Determination of whether or not a deviation has occurred shall be based on a reasonable inquiry using readily available information.

[2] Use the following entries, as appropriate

1 = Standard: When the requirement is an emission limit or standard
2 = Process: When the requirement is a production/process limit
3 = Monitor: When the requirement is monitoring
4 = Test: When the requirement is testing
5 = Maintenance: When required maintenance is not performed
6 = Record: When the requirement is recordkeeping
7 = Report: When the requirement is reporting
8 = CAM: A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.
9 = Other: When the deviation is not covered by any of the above categories

APPENDIX B: Monitoring and Permit Deviation Report - Part II

FACILITY NAME: Rocky Mountain Steel Mills – Steelmaking
OPERATING PERMIT NO: 95OPPB097
REPORTING PERIOD:

Is the deviation being claimed as an: Emergency _____ Malfunction_____ N/A

(For NSPS/MACT) Did the deviation occur during: Startup _____ Shutdown _____ Malfunction _____

Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Operating Permit Condition Number Citation

Explanation of Period of Deviation

Duration (start/stop date & time)

Action Taken to Correct the Problem

Measures Taken to Prevent a Reoccurrence of the Problem

Dates of Malfunctions/Emergencies Reported (if applicable)

Deviation Code _____ Division Code QA: _____

SEE EXAMPLE ON THE NEXT PAGE

EXAMPLE

FACILITY NAME: Acme Corp.
OPERATING PERMIT NO: 96OPZZXXX
REPORTING PERIOD: 1/1/04 - 6/30/06

Is the deviation being claimed as an: Emergency _____ Malfunction __XX____ N/A

(For NSPS/MACT) Did the deviation occur during: Startup _____ Shutdown _____ Malfunction
Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Asphalt Plant with a Scrubber for Particulate Control - Unit XXX

Operating Permit Condition Number Citation

Section II, Condition 3.1 - Opacity Limitation

Explanation of Period of Deviation

Slurry Line Feed Plugged

Duration

START- 1730 4/10/06
END- 1800 4/10/06

Action Taken to Correct the Problem

Line Blown Out

Measures Taken to Prevent Reoccurrence of the Problem

Replaced Line Filter

Dates of Malfunction/Emergencies Reported (if applicable)

5/30/06 to A. Einstein, APCD

Deviation Code _____ Division Code QA: _____

APPENDIX B: Monitoring and Permit Deviation Report - Part III

REPORT CERTIFICATION

SOURCE NAME: Rocky Mountain Steel Mills – Steelmaking

FACILITY IDENTIFICATION NUMBER: 1010048

PERMIT NUMBER: 95OPPB097

REPORTING PERIOD:_____ (see first page of the permit for specific reporting period and dates)

All information for the Title V Semi-Annual Deviation Reports must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section I.B.38. This signed certification document must be packaged with the documents being submitted.

STATEMENT OF COMPLETENESS

I have reviewed the information being submitted in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this submittal are true, accurate and complete.

Please note that the Colorado Statutes state that any person who knowingly, as defined in Sub-Section 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of Sub-Section 25-7 122.1, C.R.S.

Printed or Typed Name Title

Signature of Responsible Official Date Signed

Note: Deviation reports shall be submitted to the Division at the address given in Appendix D of this permit. No copies need be sent to the U.S. EPA.

APPENDIX C

Required Format for Annual Compliance Certification Reports

Following is the format for the Compliance Certification report to be submitted to the Division and the U.S. EPA annually based on the effective date of the permit. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

FACILITY NAME: Rocky Mountain Steel Mills – Steelmaking

OPERATING PERMIT NO: 95OPPB097
REPORTING PERIOD:

I. Facility Status

___ During the entire reporting period, this source was in compliance with **ALL** terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the Permit.

___ With the possible exception of the deviations identified in the table below, this source was in compliance with all terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference, during the entire reporting period. The method used to determine compliance for each term and condition is the method specified in the Permit, unless otherwise indicated and described in the deviation report(s). Note that not all deviations are considered violations.

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Monitoring Method per Permit?[2]		Was compliance continuous or intermittent?[3]	
		Previous	Current	YES	NO	Continuous	Intermittent
114 & 129	Electric Arc Furnace (EAF) #5, model ACEAF-150-KP-EOEBT, s/n: 90156.ROC.SE.21, with two baghouses (canopy & 4th hole).						
039	Mannesman Demag custom built Round Caster with natural gas fired cutting torches and tundish preheater.						
110	Ladle Metallurgy Station with Amerex 50 RP-14-1040 baghouse.						
106	Vacuum Tank Degasser vent						

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Monitoring Method per Permit?[2]		Was compliance continuous or intermittent?[3]	
		Previous	Current	YES	NO	Continuous	Intermittent
105	Cleaver Brooks, model CBL-700-4500-900, s/n: OLD 92860, natural gas fueled Vacuum Tank Degasser Boiler.						
112	Trestle Off-Loading of rail cars transporting flux materials.						
122	Ladle Preheat Burners (three stations).						
123	Scrap pile operations.						
125	Reline Ladle Refractory Process, including the use of binder material, refractory brick, and natural gas fueled burners.						
128	EAF wind erosion.						
General Conditions							
Insignificant Activities [4]							

[1] If deviations were noted in a previous deviation report , put an "X" under "previous". If deviations were noted in the current deviation report (i.e. for the last six months of the annual reporting period), put an "X" under "current". Mark both columns if both apply.

[2] Note whether the method(s) used to determine the compliance status with each term and condition was the method(s) specified in the permit. If it was not, mark "no" and attach additional information/explanation.

[3] Note whether the compliance status with of each term and condition provided was continuous or intermittent. "Intermittent Compliance" can mean either that noncompliance has occurred or that the owner or operator has data sufficient to certify compliance only on an intermittent basis. Certification of intermittent compliance therefore does not necessarily mean that any noncompliance has occurred.

NOTE:

The Periodic Monitoring requirements of the Operating Permit program rule are intended to provide assurance that even in the absence of a continuous system of monitoring the Title V source can demonstrate whether it has operated in continuous compliance for the duration of the reporting period. Therefore, if a source 1) conducts all of the monitoring and recordkeeping required in its permit, even if such activities are done periodically and not continuously, and if 2) such monitoring and recordkeeping does not indicate non-compliance, and if 3) the Responsible Official is not aware of any credible evidence that indicates non-compliance, then the Responsible Official can certify that the emission point(s) in question were in continuous compliance during the applicable time period.

[4] Compliance status for these sources shall be based on a reasonable inquiry using readily available information.

II. Status for Accidental Release Prevention Program:

A. This facility _____ is subject _____ is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act)

B. If subject: The facility _____ is _____ is not in compliance with all the requirements of section 112(r).

1. A Risk Management Plan _____ will be _____ has been submitted to the appropriate authority and/or the designated central location by the required date.

III. Certification

All information for the Annual Compliance Certification must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section I.B.38. This signed certification document must be packaged with the documents being submitted.

I have reviewed this certification in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this certification are true, accurate and complete.

Please note that the Colorado Statutes state that any person who knowingly, as defined in § 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of § 25-7 122.1, C.R.S.

Printed or Typed Name Title

Signature Date Signed

NOTE: All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.

APPENDIX D

Notification Addresses

1. **Air Pollution Control Division**

Colorado Department of Public Health and Environment
Air Pollution Control Division
Operating Permits Unit
APCD-SS-B1
4300 Cherry Creek Drive S.
Denver, CO 80246-1530

ATTN: Matt Burgett

2. **United States Environmental Protection Agency**

Compliance Notifications:

Office of Enforcement, Compliance and Environmental Justice
Mail Code 8ENF-T
U.S. Environmental Protection Agency, Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

502(b)(2) Changes, Off Permit Changes:

Office of Partnerships and Regulatory Assistance
Mail Code 8P-AR
U.S. Environmental Protection Agency, Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

APPENDIX E

Permit Acronyms

Listed Alphabetically:

AIRS -	Aerometric Information Retrieval System
AP-42 -	EPA Document Compiling Air Pollutant Emission Factors
APEN -	Air Pollution Emission Notice (State of Colorado)
APCD -	Air Pollution Control Division (State of Colorado)
ASTM -	American Society for Testing and Materials
BACT -	Best Available Control Technology
BTU -	British Thermal Unit
CAA -	Clean Air Act (CAAA = Clean Air Act Amendments)
CCR -	Colorado Code of Regulations
CEM -	Continuous Emissions Monitor
CF -	Cubic Feet (SCF = Standard Cubic Feet)
CFR -	Code of Federal Regulations
CO -	Carbon Monoxide
COM -	Continuous Opacity Monitor
CRS -	Colorado Revised Statute
EF -	Emission Factor
EPA -	Environmental Protection Agency
FI -	Fuel Input Rate in MMBtu/hr
FR -	Federal Register
G -	Grams
Gal -	Gallon
GPM -	Gallons per Minute
HAPs -	Hazardous Air Pollutants
HP -	Horsepower
HP-HR -	Horsepower Hour (G/HP-HR = Grams per Horsepower Hour)
LAER -	Lowest Achievable Emission Rate
LBS -	Pounds
M -	Thousand
MM -	Million
MMscf -	Million Standard Cubic Feet
MMscfd -	Million Standard Cubic Feet per Day
N/A or NA -	Not Applicable
NOx -	Nitrogen Oxides
NESHAP -	National Emission Standards for Hazardous Air Pollutants
NSPS -	New Source Performance Standards
P -	Process Weight Rate in Tons/Hr
PE -	Particulate Emissions
PM -	Particulate Matter
PM_{10} -	Particulate Matter Under 10 Microns

PSD -	Prevention of Significant Deterioration
PTE -	Potential To Emit
RACT -	Reasonably Available Control Technology
SCC -	Source Classification Code
SCF -	Standard Cubic Feet
SIC -	Standard Industrial Classification
SO_2 -	Sulfur Dioxide
TPY -	Tons Per Year
TSP -	Total Suspended Particulate
VOC -	Volatile Organic Compounds

APPENDIX F

Permit Modifications

DATE OF REVISION	TYPE OF REVISION	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION
October 1, 2012	Reopening	Section II, Condition 1.20	Condition 1.20 previously contained the requirements of 40 CFR 63 Subpart YYYY (MACT for electric arc furnaces at area sources of HAP). This condition was removed when the source was discovered to be a major source of HAP. Subsequent conditions 1.21 – 1.25 were renumbered.
		Section II, Condition 3.1	The lead emission limit for the LMS is revised from 0.0012 tpy to 0.00427 tpy, and the compliance emission factor is updated from $1.8e^{-6}$ to $6.33e^{-6}$, based on an APEN submitted by the source on April 18, 2012.
		Section II, Conditions 5.8 & 11	A new condition 5.8 is added to establish major source MACT requirements for the vacuum tank degasser boiler (40 CFR Subart DDDDD). The specific conditions are included in Condition 11.
		Section II, Condition 11	Condition 11 previously included HAP limits to establish the facility as a non-major source; now that the facility is determined to be a major source of HAP, this condition was deleted and replaced with the Subpart DDDDD requirements.
		Section I, Condition 1.4 and Section IV	Updated the General Conditions and associated references to the most recent version
February 11, 2014	Minor	Section I, Condition 6.1, Appendices B & C	Removed the flare from the description of the VTD process
		Section II, Conditions 4.1 and 4.2	Increased the annual limits on CO and number of molten steel heats (previous values: 0.87 tpy & 6738 heats), removed flare from description & emission equation
		Section II, Conditions 5.1 & 5.2	Increased the annual limits on fuel consumption and emissions (previous values were 50% of new values)

DATE OF REVISION	TYPE OF REVISION	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION
February 11, 2013	Administrative	Throughout Permit and Appendices	Corrected the AIRS Point ID for the Demag Round Caster from 040 to 039
		Page following cover page	Update responsible official
		Section II, Condition 7, Appendices B & C	Corrected typographical error: corrected the number of stations in the ladle preheat burners from three to five.
		Appendix D	Updated the EPA Mailing Addresses

APPENDIX G

Compliance Assurance Monitoring Plan: EAF

I. Background

a. Emission Unit Description:

Ultra High Power eccentric bottom tapping Electric Arc Furnace (EAF) #5, Val-Fuchs, model ACEAF-150-KP-EOEBT, s/n: 90156.ROC.SE.21, with two baghouses (canopy & 4th hole).

b. Applicable Regulation, Emission Limit, Monitoring Requirements:

Regulations:	Operating Permit Condition 1.2.1 (BACT) Operating Permit Condition 1.2.3 (Annual Limit) Colorado Regulation No. 1, Section III.C.1.b Regulation No. 6, Part A, Subpart AAa	
Emission Limitations:	Filterable PM & PM10	0.0018 grain/dscf (each baghouse)
	Total PM & PM10	0.0052 grain/dscf (each baghouse)
	PM	89.2 ton/yr
	PM10	89.2 ton/yr
	PM	39.9 lb/hr (at 185 ton/hr)
Monitoring Requirements:	Visible Emissions (Opacity), Particulate load	

c. Control Technology:

This EAF is equipped with two fabric filter dust collector baghouses (known as canopy and 4th hole) to control particulate matter emissions. The 4th hole baghouse controls emissions from the direct evacuation system during the melting process. The canopy baghouse controls emissions collected in the canopy hood system.

II. Monitoring Approach

	Indicator 1 – **4th Hole Baghouse**	Indicator 2 – **Canopy Baghouse**	Indicator 3 – **Canopy Baghouse**
I. Indicator	Visible Emissions (Opacity)	Visible Emissions (Opacity)	Particulate Monitors
Measurement Approach	Opacity emissions will be monitored by a Continuous Opacity Monitor System (COMS).	Opacity will be monitored daily using EPA Reference Method 9.	Relative particulate load will be monitored continuously in each compartment.
II. Indicator Range	An excursion is defined as any opacity reading of greater than 3%. Based on the unavailability of suitable calibration filters limited accuracy of the COMS, compliance is monitored at an opacity level of 5%. Excursions trigger the permittee to investigate the baghouse performance and make any repairs or adjustments as necessary. A record of the corrective action(s) will be maintained and made available upon request.	An excursion is defined as any opacity reading of greater than 3% Excursions trigger the permitte to investigate the baghouse performance and make any repairs or adjustments as necessary. A record of the corrective action(s) will be maintained and made available upon request.	An excursion is defined as detection of particulate load above 40% of baseline scale. Excursions trigger the permitte to investigate the baghouse performance and make any repairs or adjustments as necessary. The compartment with the excursion should be quickly investigated for possible shut down. A record of the corrective action(s) will be maintained and made available upon request.
III. Performance Criteria			
a. Data Representativeness	Measurements are made at the baghouse exhaust.	Measurements are made at the canopy baghouse exhaust.	Each of the five baghouse compartments are monitored separately.
b. Verification of Operational Status	N/A	N/A	Continuous readings, and alarms are displayed in the control room.
c. QA/QC Practices and Criteria	The COMS is in conformation with the applicable requirements in 40 CFR Part 60.	Visible emissions observers shall be certified.	The monitor automatically adjusts baseline scale. The system shall meet the requirements in 40 CFR Part 60 Subpart AAa §60.273a(e). ERMS shall comply with the BLDS site-specific monitoring plan as attached.
d. Monitoring Frequency	Continuous.	Daily.	Continuous.
e. Data Collection Procedures	Opacity measurements will be performed in accordance with the requirements in 40 CFR Part 60 Subpart A § 60.13.	Observations shall be taken daily for at least three 6-minute periods.	Readings are recorded continuously.
f. Averaging Time	COM data shall be reduced to 6-minute averages as required by 40 CFR Part 60 Subpart A § 60.13.	Six minutes.	N/A

III. Justification

a. Background:

ERMS produces steel by melting scrap metal in an Electric Arc Furnace (EAF). EAF emissions are collected via a direct evacuation system in addition to a canopy hood system. Particulate Matter is controlled with two baghouses prior to discharge via the stack(s).

b. Rationale for Selection of Performance Indicators

Monitoring of the baghouse operational parameters is intended to keep the baghouse operating within the manufacturer's specifications. Potential issues in the operation of a baghouse that can compromise its ability to effectively control particulate emissions can generally be categorized as issues with torn and/or broken bags or seals. The indicators described below were selected for their ability to provide an indication or warning of potential problems with any of these factors.

Visible Emissions (Opacity)

Based on the relationship between particulate matter in a flue gas stream and opacity, an increase in opacity is a valid indication of increased particulate emissions due to compromised baghouse performance. Increased opacity emissions from typical levels, such as a sudden spike or a gradual increase are an indication that baghouse performance has decreased.

Particulate Monitors

The particulate monitors will provide a direct indication of the particulate level in the exhaust gas which is an indicator of particulate emissions and bag filter condition.

c. Rationale for Selection of indicator Ranges

Visible emissions (opacity)

An increase in opacity, defined as an opacity reading greater than 3% is a possible indication that a bag has failed. During normal operations with no bag failures, opacity emissions will be below 3%. 3% opacity is also the limitation established in NSPS Subpart AAa.

Particulate Monitors

A 40% increase in particulate activity was established to allow for normal particulate fluctuations while guarding against a significant increase in particle activity.

Appendix B
Site Specific Monitoring Plan
for
Baghouse Leak Detection System (BLDS)
for EAF 5 Baghouse 4

This system is installed and operated in accordance with the requirements of 40 CFR 60.273a(e). The following site-specific monitoring plan is provided in accordance with the requirements of 40 CFR 60.273a(e)(4):

(i) **Installation of the bag leak detection system;** The system is installed and shall remain installed when the baghouse is in operation.

(ii) **Initial and periodic adjustment of the bag leak detection system including how the alarm set-point will be established;** The BLDS will automatically adjust during operation to establish an individual baseline for each of the 5 monitors. The alarm set-point is a 40% change from the baseline. The baseline value, and the alarm set point, will be recorded during each performance test, and will be reviewed following each required performance test, and revised if necessary.

(iii) **Operation of the bag leak detection system including quality assurance procedures;** The BLDS will be continuously operated when the baghouse is in operation. QA/QC will be performed in accordance with the manufacturer's recommendations as described in attached QA/QC plan.

(iv) **How the bag leak detection system will be maintained including a routine maintenance schedule and spare parts inventory list;** The system will be maintained, and spare parts will be inventoried in accordance with the manufactures recommendations.

(v) **How the bag leak detection system output shall be recorded and stored.** The output from the BLDS will be captured by the electronic data collection system and stored for 30 days.

APPENDIX H

Compliance Assurance Monitoring Plan: LRF

I. Background

a. Emission Unit Description:

Ladle Metallurgy Station with Ladle Refining Furnace (LRF) and Amerex 50 RP-14-1040 baghouse.

d. Applicable Regulation, Emission Limit, Monitoring Requirements:

Regulations:	Operating Permit Condition 3.1 (Annual Limit) Colorado Regulation No. 1, Section III.C.1.b	
Emission Limitations:	PM	7.44 ton/yr
	PM10	4.78 ton/yr
Monitoring Requirements:	Visible Emissions (Opacity), Particulate load	

e. Control Technology:

This Ladle Metallurgy Station is equipped with one Amerex Pulse Jet, negative pressure, five-compartment, fabric filter dust collector baghouse.

II. Monitoring Approach

	Indicator 1	Indicator 2
I. Indicator	Visible Emissions (Opacity)	Particulate Monitors
Measurement Approach	Opacity will be monitored monthly using EPA Reference Method 9.	Relative particulate load will be monitored continuously in each compartment.
II. Indicator Range	An excursion is defined as any opacity reading of greater than 10% Excursions trigger the permittee to investigate the baghouse performance and make any repairs or adjustments as necessary. A record of the corrective action(s) will be maintained and made available upon request.	An excursion is defined as detection of particulate load above 40% of baseline scale. Excursions trigger the permittee to investigate the baghouse performance and make any repairs or adjustments as necessary. The compartment with the excursion should be quickly investigated for possible shut down. A record of the corrective action(s) will be maintained and made available upon request.
III. Performance Criteria		
a. Data Representativeness	Measurements are made at the baghouse exhaust.	Each of the five baghouse compartments are monitored separately.
b. Verification of Operational Status	N/A	Continuous readings, and alarms are displayed in the control room.
c. QA/QC Practices and Criteria	Visible emissions observers shall be certified.	The monitor automatically adjusts baseline scale.
d. Monitoring Frequency	Daily.	Continuous.
e. Data Collection Procedures	Observations shall be taken daily for at least three 6-minute periods.	Readings are recorded continuously.
f. Averaging Time	Six minutes.	N/A

III. Justification

a. Background:

The Ladle Refining Furnace (LRF) process is used for refining a wide variety of steels. A ladle of molten steel is transported to the LRF where it is placed under a cover equipped with three graphite electrodes connected to a three-phase arc transformer. Fumes formed during the operation are extracted through the cover and routed through the fabric filter for particulate control.

b. Rationale for Selection of Performance Indicators

Monitoring of the baghouse operational parameters is intended to keep the baghouse operating within the manufacturer's specifications. Potential issues in the operation of a baghouse that can compromise its ability to effectively control particulate emissions can generally be categorized as issues with torn and/or broken bags or seals. The indicators described below were selected for their ability to provide an indication or warning of potential problems with any of these factors.

Visible Emissions (Opacity)

Based on the relationship between particulate matter in a flue gas stream and opacity, an increase in opacity is a valid indication of increased particulate emissions due to compromised baghouse performance. Increased opacity emissions from typical levels, such as a sudden spike or a gradual increase are an indication that baghouse performance has decreased.

Particulate Monitors

The particulate monitors will provide a direct indication of the particulate level in the exhaust gas which is an indicator of particulate emissions and bag filter condition.

c. Rationale for Selection of indicator Ranges

Visible emissions (opacity)

An increase in opacity, defined as an opacity reading greater than 10% is a possible indication that a bag has failed. During normal operations with no bag failures, opacity emissions will be below 10%.

Particulate Monitors

A 40% increase in particulate activity was established to allow for normal particulate fluctuations while guarding against a significant increase in particle activity.

APPENDIX I

Parametric Monitoring Plan

EAF, LRF, Rod/Bar Reheat Furnace

Parametric Monitoring Plan

Proposed Revision July 2008

Introduction

ERMS was required to have a Parametric Monitoring Plan as part of its compliance obligations with the Federal Consent Decree. This Plan was submitted per requirements in the consent decree in August 2002. Subsequently ERMS began collection of the parametric data at the necessary sources – namely the meltshop, LRF as well as the Rod/Bar furnace. Further discussion on these aspects is provided in previous Parametric Plan submittals to the CDPHE (please see ERMS's last Draft Parametric Monitoring Plan dated May 2007).

Subsequently, ERMS has implemented CEMS (at the EAF baghouse #3 stack and at the Rail Mill stack), COMS (at the EAF baghouse #3 stack) and particulate indicators (at the EAF baghouse #4 roof vent and at the LRF). Therefore, the need for extensive parametric monitoring is redundant. Per discussions with the CDPHE, including the letter from the CDPHE dated March 24, 2008, ERMS proposes monitoring the following parameters, in addition to the CEMS. For the purposes of streamlining this Plan, parameters to be monitored by CEMS/COMS/particulate monitors are not shown in this Plan.

Table 1
EAF and Baghouse Emissions Parameters

Parameter	Monitoring Method	Monitoring Frequency	Data Recording Frequency	Pollutant of Interest	Justification
Bag house Inlet Flow Rate (acfm)	Electronic	Continuous	Once every 5 minutes [1]	PM10	Will be monitored as part of CEMS.
Coal/coke sulfur content (%wt.)	Manual [2]	Ea. Shipment	Ea. Shipment	SO2	Permit condition. Will continue monitoring.
Turnings Content [% in blend, mass of blend]	Manual	Avg. Heat monthly	Monthly	CO/VOC	Will monitor, with changes as appropriate under discussion with agencies.
Furnace Electrical Power (kW)	Manual	Avg.[3] ton of steel	Monthly	NOx, CO/VOC	No correlation to emissions, per se. Per CDPHE Letter of March 24, 2008.

[1] This frequency may be adjusted as needed.
[2] Use supplier's certification
[3] Averaged over each month

Table 2
LRF Baghouse Parameter

Parameter	Monitoring Method	Monitoring Frequency	Recording Frequency	Pollutant of Interest	Justification
Baghouse Draft (-ve)	Electronic	Continuous	Every 5 minutes [1]	PM10	No correlation. Per CDPHE Letter of March 24, 2008.

[1] This frequency may be adjusted as needed.

Table 3
Furnace Parameter (Rod/Bar Reheat Furnace)

Parameter	Monitoring Method	Monitoring Frequency	Pollutant of Interest	Justification
Natural Gas Input (scf/hr)	Electronic	Hourly	NOx	Needed for compliance demonstration.

APPENDIX J

Scrap Management Plan

Scrap Management Plan

June 21, 2005

Rocky Mountain Steel Mills
Scrap Management Plan
June 2005

Table of Contents

Approval Record

Rev. No.	Date	Revision	Approval			
			Stlmkg. Manager	Environ. Manager	Director Operations	Plant Manager
0		**New plan**				

Distribution

Original: **Environmental Department File**

Copies: **Steelmaking Manager**
Environmental Manager
Purchasing Manager
Director of Operations
General Supervisor of Quality, Steelmaking
Plant Manager
Scrap Manager (Contractor, DJJ)
Scrap Buyer (Contractor, DJJ)

Copy mailed to the CDPHE
Copy mailed to EPA Region 8

Introduction

Rocky Mountain Steel Mills (RMSM) is the operator of the only steel mini-mill in Colorado, producing roughly 1.0 million tons per year of steel products, mainly from recycled steel materials (hereafter referred to as scrap) at its Pueblo, CO mill. The majority of this scrap is recycled automobile bodies. RMSM is the largest ferrous scrap recycler in Colorado. RMSM's scrap procurement, in-plant processing (such as sizing, cutting, sorting, handling, etc.) are currently managed by the Scrap Manager (DJJ). The scrap yard is located on roughly 22 acres of land adjacent to and to the east of the meltshop (Figure 1).

This Scrap Management Plan (Plan) has been prepared to meet the regulatory requirements discussed in the next section. It incorporates comments received by RMSM from the Colorado Department of Public Health and the Environment (CDPHE) on the Draft Plan submitted earlier. It will be implemented upon its approval by the CDPHE and the US Environment Protection Agency (EPA). However, it should be noted that RMSM has been complying with the requirements of this Plan since the effective date of the Federal Consent Decree. It should also be noted that although RMSM screens all of its incoming scrap for the presence of radioactive materials, that screening is not discussed in this Plan.

REGULATORY Requirements

This Plan has been prepared to satisfy the following requirements:

The first sentence of Paragraph 39 of the Consent Decree entered on November 26, 2003 between RMSM and the EPA – hereafter referred as the Federal Consent Decree;

The relevant portion (i.e., first sentence) of Paragraph 39 of the Federal Consent Decree states that: " Beginning no later than the date of entry of this Consent Decree, the Defendant (i.e., RMSM) shall work with its scrap supplier to ensure that the scrap mix for each heat includes no more than 3% turnings and/or borings, and shall maintain records documenting its performance."

The intent of this condition was to minimize the emissions of VOCs from the electric arc furnace.

Portions of Paragraphs 9 and 17 of the Prevention of Significant Deterioration (PSD) permit (Permit No. 02PB0492, issued on June 21, 2004) by the CDPHE for the new Modernization Project (in which the current EAF #3 will be retired and the current EAF #4 will be modified).

Paragraph 17 of the PSD permit requires that "[a]t least 60 days prior to commencing operation of the modified EAF #4, the applicant (i.e., RMSM) shall submit to the (Air Pollution Control) Division (of the CDPHE) for approval a Scrap Management Plan to describe how the emissions of Lead and VOCs from EAF #4 will be minimized and how the oily scrap in each batch will be limited to 3% or less (see

Permit Condition No. 9). The Scrap Management Plan must be approved by the Division prior to commencing operation of the modified EAF #4. The applicant shall then follow the current Division-approved Scrap Management Plan.

Paragraph 9, in part, states that "[T]he proportion of oily scrap (borings & turnings) charged in each batch shall not exceed 3% of the total scrap. Compliance records shall be maintained, and made available to the Division for inspection upon request.

Plan for Scrap Management

Personnel

The personnel responsible for the implementation of this Plan are:

Steelmaking Manager
RMSM
Telephone: 719-561-6182

Environmental Manager
RMSM
Telephone: 719-561-6536

Scrap Manager
DJJ On-Site (Pueblo, CO) Scrap Buyer
Telephone: 719-545-0263

Staffing and Responsibilities

A significant number of personnel are utilized to handle, manage and inspect the scrap. Typical staffing and responsibilities with respect to scrap handling, management and inspection are presented in the following table:

Position	Typical Total Staff	Typical Responsibilities
Steelmaking Manager	1	• Implement Approved Plan

Position	Typical Total Staff	Typical Responsibilities
Environmental Manager	1	• Interface with regulatory agencies and maintenance of compliance records • Approval of Plan • Periodic updating of the Plan as necessary
General Supervisor of Quality, Steelmaking	1	• Insure Compliance with the Scrap specifications of the Plan • Scrap receiving and handling
Scrap Manager	1	• Shift operations of scrap yard ➢ Scrap inspection ➢ Scrap handling ➢ Responsible for ensuring that lead containing materials will not be accepted ➢ Ensures that amount of turnings[2] in Blend car will not exceed 3% in a given heat, as required.[3] This is done for each Blend car which can support one or more heats.
Scrap Buyer	1	• Purchasing of raw materials, including scrap material • Contract negotiations with scrap suppliers

Scrap Specification

RMSM purchases, depending on its production requirements, various amounts of different standard grades of scrap. these include: plate and structural, #1 heavy melt, railroad rail etc., #1 busheling, #1 railroad steel, #2 heavy melt, #1 bundles, mandrel and coil bundles, shredded, #2 bundles, turnings, flashings, borings, blended scrap, etc.

RMSM utilizes the most current version of its internal "Purchase Specification PRS-ST-08, Purchased Scrap" to ensure that the proper quality and types of scrap are purchased to support its steel making operations. Since scrap is the main raw material for the steel recycling process, RMSM (and its scrap manager, DJJ) works closely with suppliers (such as shredders and other suppliers) to obtain scrap

[2] Throughout this Plan, the word turnings will represent both turnings and borings.

[3] As discussed later, turnings are only added into a heat via the Blend material. Since the actual amounts of Blend and non-Blend metallics that are added to a particular heat are not exactly fixed, the Scrap Manager, based on previous experience and knowledge of typical heat inputs, adds enough turnings into the Blend so as to never exceed the 3% limit in the heat. Typically, he targets a 2.5% level so as to leave some room for margin during actual input into the heat charge bucket.

that is compatible with the products that RMSM produces, RMSM's purchase specifications and RMSM's environmental requirements. This Specification is confidential business information (CBI) and is therefore not being included in this Plan[4].

However, RMSM commits that the following language that directly pertains to VOC contaminants and to the control of inappropriate substances such as lead will always be included in the most recent version of this Specification:

- "All grades of scrap shall be free of nonferrous metals, nonmetallics, excessive dirt, oil, and grease."

- "The following items will not be accepted: Lead containing material - e.g., batteries, metal guttering and other terne plated material, wheel weights, radiators, lead joints, in soil pipes, oil filters, etc."

- "No single heat of steel shall contain in excess of 3% turnings and borings by total weight."

- "In the event that any heat of steel contains more than the maximum level of 3% total weight of turnings and borings, a corrective action will be issued to the responsible party (DJJ or RMSM)."

- "The scrap supplier will be instructed to offload the unaccepted material prior to crossing the scale by RMSM / DJJ inspection personnel. When the driver departs, they will reload the unaccepted material prior to leaving DJJ yard."

It is RMSM's intent there should be no exceptions to these requirements.

As discussed above, by (a) clearly defining the acceptance criteria of the scrap to not include objectionable material; (b) ensuring that there is a margin to ensure that the 3% turnings requirement is met; and (c) by allowing for the development of corrective actions in the event that this 3% limit is exceeded, RMSM and its scrap buyers have made every effort to ensure that this condition will always be met.

Figure 1 shows the manner in which the material and information flows from the scrap manager (DJJ) to RMSM's meltshop and back. As noted earlier, turnings can only be added into the final heat via materials in the Blend car. DJJ puts in an amount of turnings into a Blend car based on a likelihood that it will result in approximately 2.5% turnings in a heat. DJJ notes the amounts of turnings in each Blend car. This is done based on past operating experience. The exact proportion of metallic materials that are put into a heat from the Blend and other non-Blend cars will ultimately determine the exact amount of turnings in a heat. RMSM notes the amounts of material that are used from a given Blend car in various heats (typically a Blend car will be used as inputs for one to three heats or so). This is done for every heat. RMSM then sends information on each heat (i.e., amounts of blend

[4] It is available for inspection by the CDPHE at any time at the RMSM Pueblo Plant under CBI rules.

and other materials added into that heat). DJJ compiles this information on a monthly basis and checks that the 3% limit was not exceeded in any heat. The details of each heat are business confidential and are available to the CDPHE under CBI rules, upon request[5].

On a monthly basis, RMSM summarizes the maximum and average percent turnings in each heat in a given month. As noted above, should the amount of turnings in a heat exceed 3% by weight, RMSM and DJJ will reevaluate their respective procedures and take the necessary corrective actions as needed. However, by managing the quantity of turnings on a proactive basis as described earlier, it is anticipated that there will be no need for corrective actions.

The Blend car at DJJ is usually loaded from two sources – a loader and/or a loco-crane. Each is calibrated on a monthly basis and calibration records for each of these is maintained by the Scrap Manager.

Thus, using the procedures above, RMSM is currently meeting its regulatory requirements pertaining to scrap.

Distribution and Recordkeeping

This Plan will be distributed to various RMSM (and contractor) personnel for their information and use. A copy of this Plan will also be kept on site in the Environmental Department files.

The records required by this plan are maintained at RMSM's Steelmaking and Environmental offices and are available for review at the Division's request. Certain records as described above are CBI and confidentiality must be maintained in accordance with CBI rules.

[5] The following CBI records are available to the CDPHE for inspection, upon request: Purchase Specifications including any exceptions; heat-specific turnings content; scrap inspection records, findings and corrective actions taken, if any; scale calibration records. The RMSM Environmental Manager should be contacted to review these records.

APPENDIX K

Fugitive Particulate Emissions Control Plan

Fugitive Particulate Emissions Control Plan

Rocky Mountain Steel Mills
Pueblo, CO

April 1, 2005

Rev 1

(February 24, 2006)

Introduction and Organization

Rocky Mountain Steel Mills (RMSM) owns and operates a steel mill located in Pueblo, Colorado. At the plant, steel is manufactured by melting scrap in an electric arc furnace. RMSM then forms the steel into various finished products, such as rod, rail, and pipe.

This Fugitive Particulate Emissions Control Plan (Plan) has been prepared to address fugitive particulate emissions at the plant in accordance with the following regulatory authorities. In addition to the main text, this Plan contains figures showing the locations of the potential fugitive source areas at the plant (Attachment A, Figures 1 and 2), copies of sub-Plans from RMSM's major subcontractors (DJJ Company in Attachment B and MultiServ in Attachment C), copies of various recordkeeping forms in Attachment D and a copy of relevant portions of Colorado Air Quality Control Commission Regulation 1 in Attachment E.

Regulatory Background

RMSM's operations are subject to the Colorado Air Quality Control Commission (CAQCC) regulations, including Regulation No. 1, Sections III.C, III.D and V regarding the control of fugitive emissions. In addition, in the past RMSM has entered into a Compliance Order with the Colorado Air Pollution Control Division (APCD or Division) which in part requires that a fugitive emission control plan consistent with the requirements of Regulation 1, Section III.D be submitted covering RMSM's steelmaking area. This has been in effect since October 31, 1999 with modification on May 15, 2000.

In addition, Paragraphs 18 of the Prevention of Significant Deterioration (PSD) permit . 02PB0492, Issued on 6/21/2004 by the CDPHE for the new Modernization Project (in which the current EAF #3 will be retired and the current EAF #4 will be modified into new EAF #5) also requires, in part, that:

"Within 60 days after issuance of this permit, the applicant (i.e., RMSM) shall submit to the Division for approval a Fugitive Particulate Emissions Control Plan to describe how the generation of fugitive particulate matter associated with the operation of EAF #4 (including emissions from wind erosion from exposed areas and stockpiles, raw material and slag handling operations and finished products) will be minimized and controlled...."

Finally, Title V Operating Permit # 95OPPB098 (renewed May 1, 2004) discusses applicable fugitive control requirements for haul roads and storage piles. Specifically, this plan is also designed to serve as the plan as provided in Appendix G of the Title V permit.

Plan Objectives

It is RMSM's goal to minimize fugitive particulate emissions and stay in compliance with the requirements of the governing regulations. In this case that means staying in compliance with the requirements of Regulation 1 of the CAQCC as described in this

Plan as well as in compliance with Title V permit requirements for haul roads and storage piles.

For an existing source such as RMSM, these regulations require that the owner/operator "*employ such control measures and operating procedures as are necessary to minimize fugitive particulate emissions into the atmosphere through use of all available practical methods which are technologically feasible and economically reasonable.*" Additional requirements of these regulations are discussed later.

Potential Fugitive Particulate Sources

The sources shown in Table 1 are covered by this plan. It should be noted that RMSM uses two contractors to assist in its production activities. The David J Joseph Company is responsible for scrap management operations including the management of the scrap yard located to the east of the meltshop. In addition, MultiServ manages slag handling, metals recovery and related operations. MultiServ operations are located roughly south-east of the meltshop. Additional details on their Plans are provided as Attachments B and C, respectively.

The sources listed in Table 1 are also shown in the Figures in Attachment A.

Table 1 also shows the primary party responsible for each source, the source type as defined in Regulation 1, Section III.D, and the respective applicable emissions limitations also provided in Regulation 1, Section III.D.

Table 1 – Source Areas, Types, Emissions Limitations, and Mitigation Options

PSD Source # and Name	Party	Source Type (per Regulation 1, III.D)	Applicable Emission Limitation Guideline[1]	Location
8. Trestle Unloading	RMSM	Storage and Handling of Materials	20% Opacity and No Off-Property Transport	Fig 1
111. Harlem Dump and EAF Storage	RMSM	Storage and Handling of Materials	20% Opacity and No Off-Property Transport	Fig 1
112. Clean Fill Site	RMSM	Storage and Handling of Materials	20% Opacity and No Off-Property Transport	Fig 1
113. South Dump Stations D and C	RMSM	Storage and Handling of Materials	20% Opacity and No Off-Property Transport	Fig 1
114. Harlem Mill Scale Storage Site	RMSM	Storage and Handling of Materials	20% Opacity and No Off-Property Transport	Fig 1
115. South of Lime Plant Mill Scale	RMSM	Storage and Handling of Materials	20% Opacity and No Off-Property Transport	Fig 1
221. EAF Wind Erosion	RMSM	Storage and Handling of Materials	20% Opacity and No Off-Property Transport	Fig 1
222. EAF Wind Erosion	RMSM	Storage and Handling of Materials	20% Opacity and No Off-Property Transport	Fig 1
223. EAF Wind Erosion	RMSM	Storage and Handling of Materials	20% Opacity and No Off-Property Transport	Fig 1
224. EAF Wind Erosion	RMSM	Storage and Handling of Materials	20% Opacity and No Off-Property Transport	Fig 1
225. SWMU 51 Wind Erosion	RMSM	Storage and Handling of Materials	20% Opacity and No Off-Property Transport	Fig 1
121. Haul Roads	RMSM	Haul Roads	No Off-Property Transport	Fig 2
122. Haul Roads	RMSM	Haul Roads	No Off-Property Transport	Fig 2
123. Haul Roads	RMSM	Haul Roads	No Off-Property Transport	Fig 2
13M. DJJ Mobile Sources	DJJ	Unpaved Roads	Nuisance	Fig 1
13W. DJJ Wind Erosion	DJJ	Storage and Handling of Materials (scrap)	20% Opacity and No Off-Property Transport	Fig 1
301. Slag Processing Area	MultiServ	Unpaved Roads	Nuisance	Fig 1
301. Slag Processing Area	MultiServ	Storage and Handling of Materials	20% Opacity and No Off-Property Transport	Fig 1
Crane Drop Ball Pit	MultiServ	Slag Breaking and Handling of Materials	20% Opacity and No Off-Property Transport	Fig 1

[1] As noted in Title V permit #95OPPB098, Section 3.3, "[t]he 20% opacity, no off-property transport, and nuisance emission limitations are guidelines and not enforceable standards…"

Emissions Control Measures

This section contains additional discussion of the various mitigation measures used by RMSM to reduce fugitive particulate emissions from the various Source Types in Table 1 above, to the maximum extent possible. Each of the source types listed in Table 1 can be categorized as one of the following types of sources/activities.

Storage and Handling of Materials
RMSM and its contractors use a combination of 1) stabilization; 2) watering; 3) minimizing disturbed working areas; and 4) reducing drop heights to the maximum extent possible. Storage piles as are visually inspected periodically using the approach provided in Regulation 1 Appendix B to ensure that the applicable requirements listed in Table 1 above are met.

EAF Wind Erosion Areas
The dust control measures for this area are: 1) natural cover by native vegetation, 2) artificial cover such as paving; and 3) daily inspection using the approach provided in Regulation 1 Appendix B and corrective actions when necessary.

Haul and Unpaved Roads
The dust control measures for haul and unpaved roads focus on two approaches: 1) reducing the silt loading on plant roads via periodic road sweeping on an as needed basis, and 2) controlling road dust using watering and other control measures. Additionally, daily inspections are conducted using the approach provided in Regulation 1 Appendix B.

Specific fugitive emission control measures for in-plant roads are listed below.

- Designate Haul Roads: Haul roads have been identified and daily inspections are conducted. Designated routes are treated with water or other dust control measures and are routinely swept. This dust control measure is designed to eliminate traffic from areas that do not have dust control and reduce track-out of dust generating materials onto the approved roads.

- Remove Fines from Haul Routes: RMSM periodically reduces the fine material that builds up on plant roads as a result of past use. This measure is intended to reduce the dust generating potential of the approved roadways and make the other dust control measures more effective.

- Employ Watering or Equivalent Emissions Control Practices on Unpaved Roads: RMSM employs watering and other dust control practices to reduce dust from vehicular traffic on roads. Watering frequency is at least three times per week except when operations are down or natural precipitation controls the dust to prevent off-site transport of road dust emissions. RMSM will also continue to evaluate other dust control measures such as the use of magnesium chloride or other chemical dust

suppressants. Such alternative measures will be studied using "test sections" of roadways to determine the relative costs and effectiveness before full implementation.

- Employ Street Sweeping/Washing on Paved Roads: RMSM also periodically cleans designated paved roads. Road sweeping/washing frequency is determined on a monthly basis to prevent off-site transport of road dust emissions.

In addition to the above source types at the RMSM plant, the following specific sources are addressed in Contractor Plans provided in the Attachments B and C.

Scrap Handling and Transfer
See additional discussion in the DJJ Plan in Attachment B.

Slag Handling and Transfer
See additional details in the MultiServ Plan shown in Attachment C.

Compliance Assessment and Corrective Actions

RMSM uses a combination of preventive and reactive measures to minimize emissions of fugitive particulate emissions. Daily inspections using the approach in Regulation 1, Appendix B are conducted to evaluate the effectiveness of control measures and to insure that control methods are being applied. While every effort is made to ensure that such emissions are minimized, RMSM recognizes that occasionally such emissions can occur. When they do, RMSM uses a Corrective Action process to: (a) investigate and identify the cause(s) of such emissions; and (b) take steps to implement appropriate corrective measures, such as those discussed earlier, to prevent emissions from occurring.

Recordkeeping

RMSM maintains records documenting that the fugitive emission control practices committed to in this Plan are carried out. The following types of documents are/will be maintained at the plant.

1. Daily Environmental Water and Solid Waste Report, Daily Fugitive Emission Observation Log, and Control Measures Summary Report will be maintained documenting each time a particular emissions control measure is employed (road watering, application of dust control chemicals, road sweeping, etc.). Documentation on the type of control measure, its date(s) of implementation, the area or sources to which it was applied and any additional pertinent details regarding its application will be maintained. An example of all these documents are contained in Appendix D.

2. RMSM will also maintain a nuisance log to track and complaints that are received at the plant in relation to fugitive emissions from the plant. This log will trigger appropriate

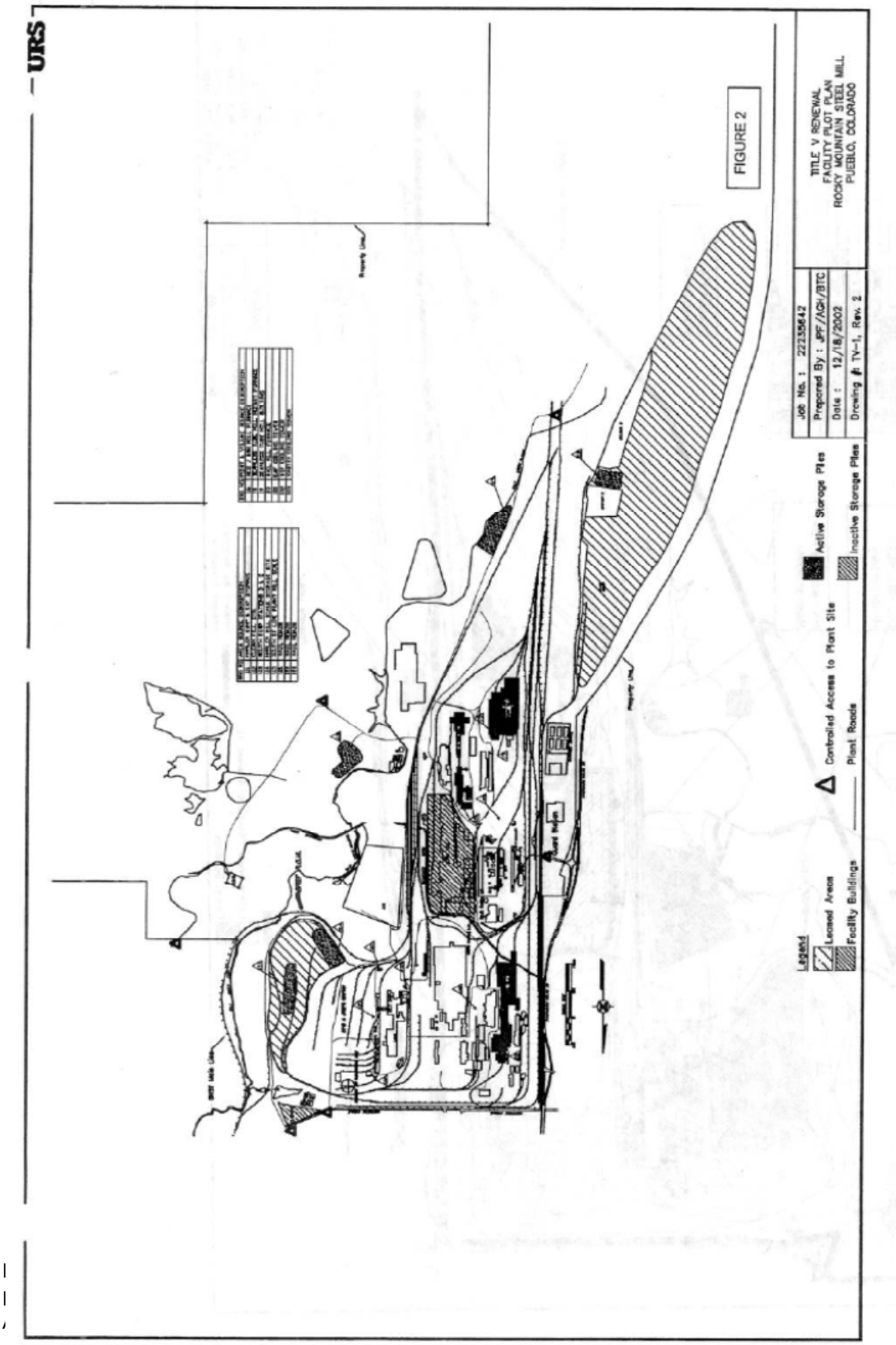
Corrective Actions depending on the source of emissions. An example nuisance log is shown in Appendix D.

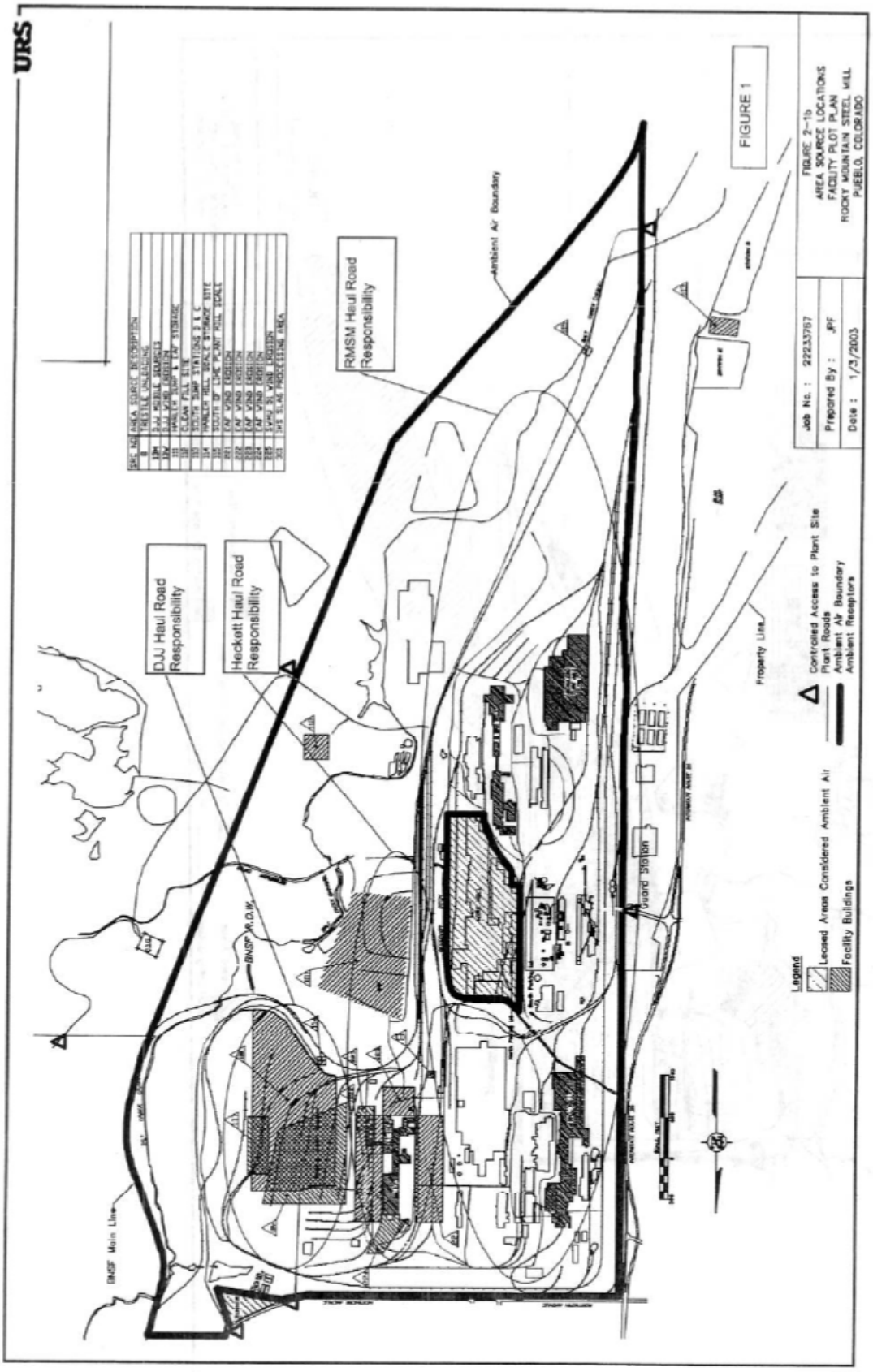
3. RMSM will maintain details of Corrective Actions that are implemented in response to complaints or observations of fugitive emissions. The details of such Corrective Actions are similar to those kept under Item 1 above.

4. Lastly, RMSM will maintain copies of all observation logs associated with periodic monitoring of fugitive emissions. For example, as required by its Title V operating permit Section 3.3, RMSM conducts daily checks of the haul roads and storage piles to determine if visible emissions exist. An example log is shown in Appendix D.

ATTACHMENT A

Figure 1	**Area Source Locations**
Figure 2	**Title V Renewal Facility Plot Plan**


URS
FIGURE 2
TITLE V RENEWAL
FACILITY PLOT PLAN
ROCKY MOUNTAIN STEEL MILL
PUEBLO, COLORADO
Job No. : 22235642
Prepared By : JPF/AGH/BTC
Date : 12/18/2002
Drawing #: TV-1, Rev. 2
Legend
Leased Areas
Facility Buildings
Plant Roads
Controlled Access to Plant Site
Active Storage Piles
Inactive Storage Piles


URS
FIGURE 1
FIGURE 2-1b
AREA SOURCE LOCATIONS
FACILITY PLOT PLAN
ROCKY MOUNTAIN STEEL MILL
PUEBLO, COLORADO
Job No. : 22233767
Prepared By : JPF
Date : 1/3/2003
RMSM Haul Road Responsibility
DJJ Haul Road Responsibility
Hackett Haul Road Responsibility
Ambient Air Boundary
Property Line
Guard Station
BNSF Main Line
BNSF R.O.W.
Legend
Leased Areas Considered Ambient Air
Facility Buildings
Controlled Access to Plant Site
Plant Roads
Ambient Air Boundary
Ambient Receptors

ATTACHMENT B

FUGITIVE EMISSIONS CONTROL PLAN

FOR

DAVID J JOSEPH COMPANY OPERATIONS

INTRODUCTION AND BACKGROUND

The David J. Joseph Company (DJJ) provides scrap management services to Rocky Mountain Steel Mill (RMSM) located in Pueblo, Colorado. Services include, switching services, scrap management, scrap processing and scrap blending.

The following DJJ operations are covered by the plan.

- Plant and Yard Roadway Use
- Scrap Processing
- Scrap Management and Blending
- Intra-Plant Railcar Cleaning

This plan presents fugitive emission control measures for these operations.

The DJJ emissions control plan will be reviewed periodically to assess the effectiveness of the plan in controlling emissions within emissions guidelines. The assessment will be based on observations by DJJ personnel and on the observation of RMSM staff.

DJJ employees will be trained in the proper techniques to handle and process scrap to minimize fugitive dust emissions and this plan, as well as proper watering techniques.

TRAINING

All DJJ employees will be trained on an annual basis on the effects each operation has on the generation of fugitive dust emissions. This training will include the controls depicted in the following table.

Process	Emissions Controls
Vehicle Traffic	Minimize Speed Post and Enforce Speed Limits With a 10 MPH maximum speed limit in the scrap handling areas. Water Roadways
Loader Operators	Minimize Speed of Travel. With a 10 MPH maximum speed limit. Minimize drop height. Avoid Scraping Soil / Sediment When Pushing Material Piles Apply Water to Piles When Necessary
Crane Operators	Minimize Drop Height to No More Than 3 Feet When Transferring Material Apply Water to Piles When Necessary
Mobile Shear Operators	Minimize Height of Material While Cutting to No More Than 3 Feet from the Ground Apply Water to Piles When Necessary
Torch Cutting Operations	Extinguish Incipient Fires Immediately Use the Proper Tip and Gas Pressures to Minimize Fugitive Emissions Stop Cutting if Material Appears Excessive in Emissions Cut Over the Water Table Where Feasible

PLANT AND YARD ROADWAY USE

The applicable emissions guideline for fugitive emissions associated with vehicle traffic is preventing "off-site transport" of emissions.

DJJ has unpaved roadways and an unpaved yard in its assigned area. The unpaved roads and yard will be watered daily if required to keep fugitive emissions within emission guidelines. (Attachment A)

Inspection of the roadways and yard will be conducted by the site foreman. Documentation of watering will be maintained at the DJJ main office. (Attachment B)

SCRAP PROCESSING

DJJ processes scrap for the purposes of the RMSM process. DJJ will use optimized torch tips and operating pressures, as well as, an automated over-water torch cutting system (as appropriate), in order to minimize visible emissions during processing.

In addition, DJJ is in the process of switching fuel gas for torch-able scrap processing, which is being done to better minimize emissions. Propylene gas is being plumbed throughout the operation in place of the current Natural gas. Also, Unleaded gasoline will be used as an alternate fuel source, which has been proven to reduce smoke.

Inspection of the "processing" of scrap will be conducted by the site foreman and all DJJ employees involved in the processing operations. This should insure the effectiveness of the plan in controlling emissions.

The following table outlines the typical operating pressures for the tips used in the torch cutting operations.

Torch Tip Size	Fuel Pressure	Oxygen Pressure
#9	15-18 PSI Natural Gas	100-120 PSI
MP-100	15-18 PSI Natural Gas	25-35 PSI Preheat 130-150 Cutting Pressure
#9	15-18 PSI Propylene Gas	90-110 PSI
#2 Harris Calorific	15-18 PSI Propylene Gas	90-110 PSI

SCRAP MANAGEMENT AND BLENDING

The DJJ Company performs sorting and handling of scrap for the purpose of the RMSM Steelmaking process. Storage piles are maintained and consist primarily of metal scrap. Material will be loaded in and out of these piles on a regular basis. Emissions control measures may include but are not limited to "watering" down the piles to help control any emissions that may be generated.

It is the responsibility of the site foreman and all DJJ employees involved in this process to insure the effectiveness of the plan in controlling emissions.

- Copy of Drivers Log (Attachment A)
- Copy of Daily Yard and Road Inspection Log (Attachment B)

INTRA-PLANT RAILCAR CLEANING

The DJJ Company will also assist in cleaning of intra-plant railcars in order to minimize residual material build-up in the car bottoms. Cars will be removed from service and cleaned when the light weight reaches 100,000 lbs. A monthly spreadsheet will be

maintained at DJJ, which serves as a log of what has been cleaned. Data will include car mark, identification number, date cleaned, light weight prior to cleaning, light weight after cleaning, total weight removed and net tons removed.

Rocky Mountain Steel Mills
Fugitive Emmisions Control Plans For Steelmaking
Road Dust Control Summary

Date	Start	End	DJJ	S/M	R/M	T/M	T/A	Roads	Comments

DAILY YARD AND ROAD INSPECTION LOG

DATE	COMMENTS

ATTACHMENT C

FUGITIVE EMISSIONS CONTROL PLAN

FOR

MULTISERV OPERATIONS

Introduction and Background

MultiServ provides steel/slag management services to Rocky Mountain Steel Mill (RMSM) located in Pueblo, Colorado. Services include hauling steel slag from the RMSM steel making area, recouping scrap metal from the slag in a MultiServ metal recovery plant, returning the scrap to RMSM and marketing slag products.

Plan Objectives

The following MultiServ operations and potential fugitive dust emissions sources are covered by the Plan

MultiServ Roadway Use
Slag hauled from RMSM Steel Production
MultiServ Surge Pile
Crane Drop Ball Pit

The plan presents fugitive emission control measures for these operations

The MultiServ fugitive emission control plan will be reviewed periodically to assess the effectiveness of the plan in controlling emissions within the emissions guidelines. The assessment will be based on observations by MultiServ personnel and on the observations of RMSM staff.

Emissions Sources and Control Measures

MultiServ Roadway Use

The applicable emissions guideline for fugitive emissions associated with vehicular traffic is preventing "off-site transport" of emissions.

General	Water piles before processing
Vehicle Traffic	Minimize Speed to less than 20 mph Enforce Speed Limits Water Roadways Procedures for Watering hot Slag in trucks
Surge or Current Pile	Minimize Speed of Travel Apply Water to Piles at least a day or two prior to working
Crane Drop Ball Pit	Clean Pit during each setup Apply Water to Piles When Necessary

MultiServ has both paved and unpaved roadways and an unpaved yard in its assigned areas (the MultiServ operations area and the Harlem dump site). For the unpaved roadways and yard in the MultiServ operations area, MultiServ will water daily as required to keep fugitive emissions within emission guidelines. The water truck runs daily on roads except for days with precipitation.

Unpaved gravel or slag roadways and yard areas are subject to reduction in the size of the aggregate for use. As fines build up, watering becomes less effective. The roads will be graded on an ongoing basis to keep the material compact.

For the paved roads on the MultiServ operating area and the Harlem site loading area, MultiServ will water and sweep the roads as required to meet emission guidelines. Frequency will be determined by roadway conditions.

Speed limits (20 mph) will be set consistent with maintaining required operating schedules and controlling emissions to the lowest practical level. MultiServ operators will be trained to obey the speed limits and reduce speed consistent with the roadway conditions.

Slag Hauling from Steel Production

Slag transfer operations are subject to 20% opacity and no "offsite transport" emission guidelines.

Each truckload of steel slag hauled from steel production to the MultiServ surge pile will be watered at the truck watering station located at the MultiServ plant. Watering will be for a period of no less than 15 minutes. Records will be maintained to ensure watering is conducted as outlined.

In an effort to ensure ample watering of the slag from steel production, two trucks will be used whenever possible. One truck will be parked under the water until the second truck returns with a fresh load. This means that most trucks may be watered for at least 30 minutes before being dumped into the surge pile. There are times that mechanical difficulties prevent this system from being used and the 15-minute minimum watering times will prevail.

Crane Drop Ball Pit

Crane drop ball pit operations are subject to 20% opacity and no "offsite transport" emission guidelines.

The crane set up is done at least once per day. Occasionally, the crane operator removes slag and steel from his crane pit up several times a day. Prior to putting steel/slag to be broken up in the pit, the crane operator will dig the pit out to clean it of fines and debris making the pit base more solid. This will prevent dust from rising into the atmosphere when the 12-ton breaking ball is dropped on the steel/scrap. This also helps improve production as the cushion of material is removed from the pit. When dry conditions are prevalent, the crane operator will ask the water truck operator to use the water cannon and wet the area. The watering of the crane pit cannot be excessive due to the spring like effect that pools of water have on flying debris potentially causing unsafe working conditions.

Training

All MultiServ employees will be trained on an annual basis on the effects each operation has on the generation of fugitive dust emissions. This training will include the controls depicted in the following table.

Employees are typically trained by other senior and more experienced employees to run the water truck safely and then shown the areas of the plant that need to be watered. They are shown how to water the slag piles so they don't create mud and clog up the plant. The minimum watering time is 15 minutes for hot slag received from mill only – this is directly done in the slag truck. This is explained to the truck drivers. New employees are told that severe discipline can result from failure to follow the watering rules.

Recordkeeping

Shown below are examples of logs maintained by MultiServ to document that proper fugitive control measures are implemented:

Truck Hauling Report

Street Sweeping Summary

Truck Hauling Report

Plant # _____ at _____

Date: _____ Truck No. _____ Light Weight _____

Odometer reading: Beginning: _____ Ending: _____ Total: _____

Maximum speed: _____

Trip No.	From	To	Time Loaded	Time Empty	Material and Weight	Scale Ticket
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						
31						
32						
33						
		Totals:				

Approved: _____ Driver: _____

MultiServ

Street Sweeper Summary Unit # 501831

Month:

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	Totals
Attention: Carl Hund																
R.M.S.M Purchase# 1041853																
South End Electric Furnace																
East Side Electric Furnace																
West Side Electric Furnace																
Electric Furnace Breezeway																
14" Mill Road																
Brick Shed Road																
Other Areas																
Tube Mill																
Rail Mill																
Rod and Bar Mill																
Guard H.Q.																
D.J.'s Road to Scale																
East Side of Rod Mill																
RMSM Garage																
RMSM Entrance Road																
North of Mill																
Heckett Road																
Rod and Tube Mill Road																
Daily Totals																

Operator: _____

J:_POOL\ENVIRON\PLANS\FUGITIVE\Sweeper Summary

MultiServ

Street Sweeper Summary Unit # 501831

Month: _____

Attention: Carl Hund
R.M.S.M Purchase# 1042515

	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	Totals
South End Electric Furnace																	
East Side Electric Furnace																	
West Side Electric Furnace																	
Electric Furnace Breezeway																	
14" Mill Road																	
Brick Shed Road																	
Other Areas																	
Tube Mill																	
Rail Mill																	
Rod and Bar Mill																	
Guard H.Q.																	
D.J.'s Road to Scale																	
East Side of Rod Mill																	
RMSM Garage																	
RMSM Entrance Road																	
North of Mill																	
Heckett Road																	
Rod and Tube Mill Road																	
Daily Totals																	

Operator: _____

ATTACHMENT D

RECORDKEEPING FORMS

1. Example Daily Environmental Water and Solid Waste Report.
2. Example Daily Fugitive Emission Observation Log.
3. Control Measures Summary

DAILY ENVIRONMENTAL WATER & SOLID WASTE REPORT

Day	Date	Operator	Precipitation (inches)	>3.8"	Weather	Wind dicection and speed(MPH)	COMMENTS
Su							
M							
W							
Th							
F							
Sa							

>3.8" Precipitation, Inspection of Stations B & E is required

RESERVOIR DATA				PLANT EFFLUENT DATA					10' FLUME				8' Flume					10' Vis. Oil
Day	Date	pH	Temp	Time	Tmp(°F	pH	Lab pH	Do	Flow(MGD	Meter (ft.)	Visual (ft.)	CFS	MGD	S'Gage(ft.	pH	CFS	MGD	(Y/N)
Su																		
M																		
Tu																		
W																		
Th																		
F																		
Sa																		

	Duck Pond			NML		WMWO		WMNR		SMRS		VTDCL		DWTP		
Day	Date	pH	DO	Time	pH	Time	pH	Time	pH	Time	pH	Time	pH	Time	pH	Flow (GPM)
Su																
M																
Tu																
W																
Th																
F																
Sa																

SEWAGE PLANT DATA

		Influent						Effluent						Lagoon #		COMMENTS
	Date	Time	Temp	pH	TS	DO	BOD	Time	Temp	pH	TS	DO	BOD	Temp.	DO	
Tu																

Inspection Log - WASTE FACILITIES

	Inspection				CASUAL AIR OBSERVATIONS										
	Date	Initial	Date	Initial											
LOCATION					Date	Rail Fce	Time	Rod Fce	Time	Stm R Fce	Time	DJJ	Time	HMS	Time
South Dump -) Station A					Su										
-) Station C					M										
-) Station D					T										
Excavation - PROPER DISPOSAL					W										
Steel Making - Arc Furnace BH Silos					Th										
Trash - Unauthorized Material					F										
Ball Parks 2 & 3 - Unauthorized Mat.					Su										

OFFSITE FUGITIVE OBSERVATIONS

			WIND		LOCATION	SOURCES	OBSERVATION 1		OBSERVATION 2		COMPL	* CORRECTIVE ACTIONS
Day	Date	Time	Direction	Velocity (MPH)			Emissions	Time	Emissions	Time	(Y/N)	
Su												
M												
Tu												
W												
Th												
F												
Sa												

COMMENTS:

*Date, time, cause and description of corrective action taken must be documented.

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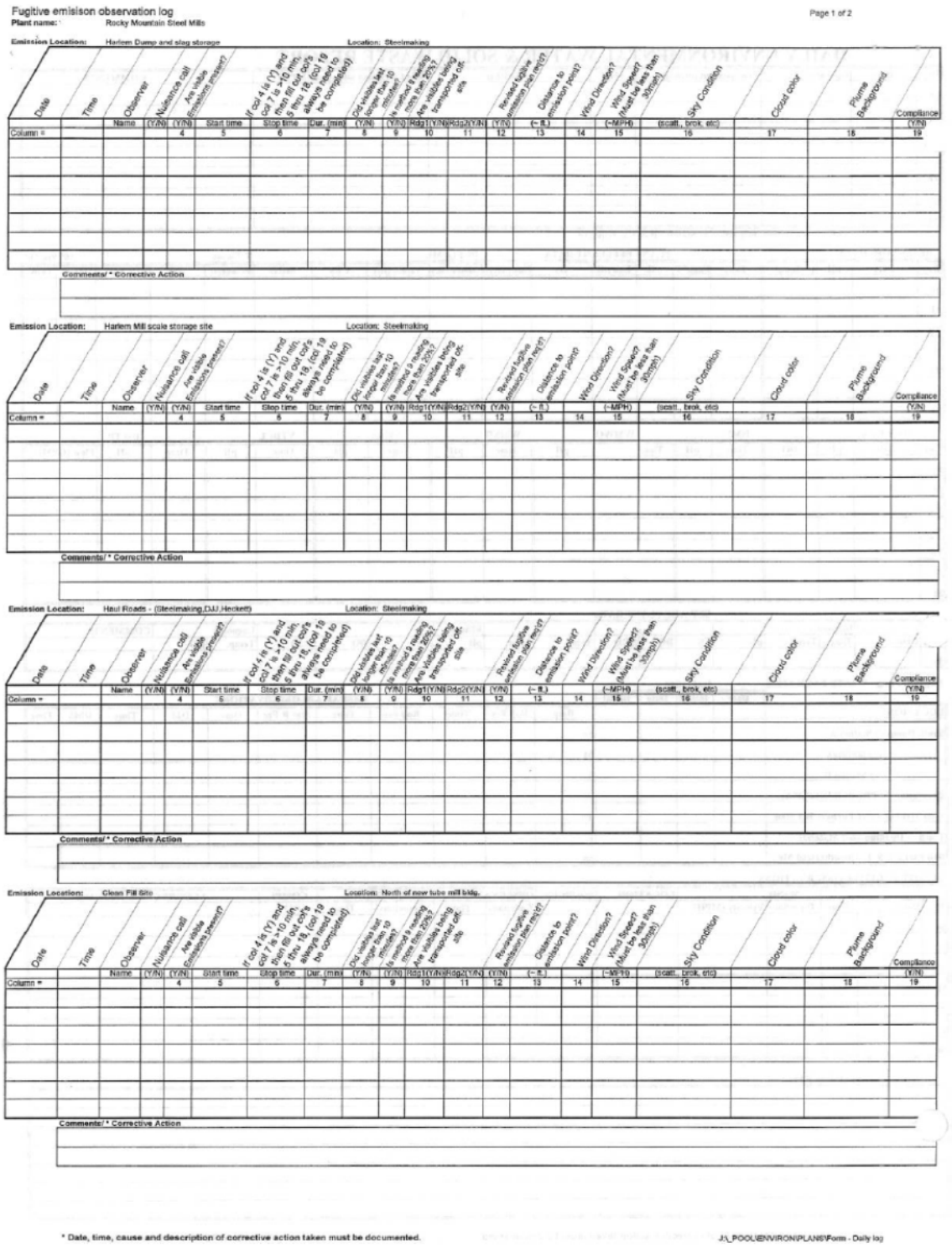

Fugitive emisison observation log

Page 1 of 2

Plant name: Rocky Mountain Steel Mills

Emission Location: Harlem Dump and slag storage — **Location:** Steelmaking

Date	Time	Observer	Nuisance call (Y/N)	Are visible Emissions present? (Y/N)	Start time	Stop time	Dur. (min)	Did visibles last longer than 10 minutes? (Y/N)	Is method 9 reading more than 20%? (Y/N)	Are visibles being transported off-site (Rdg1)(Y/N)	(Rdg2)(Y/N)	Revised fugitive emission plan rev'd? (Y/N)	Distance to emission point? (~ ft.)	Wind Direction?	Wind Speed? (Must be less than 30mph) (~MPH)	Sky Condition (scatt., brok. etc)	Cloud color	Plume Background	Compliance (Y/N)
Column #		Name	(Y/N)	(Y/N) 4	Start time 5	Stop time 6	Dur. (min) 7	(Y/N) 8	(Y/N) 9	Rdg1 (Y/N) 10	Rdg2 (Y/N) 11	(Y/N) 12	(~ ft.) 13	14	(~MPH) 15	(scatt., brok. etc) 16	17	18	(Y/N) 19

Comments/ * Corrective Action

Emission Location: Harlem Mill scale storage site — **Location:** Steelmaking

Date	Time	Observer	Nuisance call (Y/N)	Are visible Emissions present? (Y/N)	Start time	Stop time	Dur. (min)	Did visibles last longer than 10 minutes? (Y/N)	Is method 9 reading more than 20%? (Y/N)	Are visibles being transported off-site (Rdg1)(Y/N)	(Rdg2)(Y/N)	Revised fugitive emission plan rev'd? (Y/N)	Distance to emission point? (~ ft.)	Wind Direction?	Wind Speed? (Must be less than 30mph) (~MPH)	Sky Condition (scatt., brok. etc)	Cloud color	Plume Background	Compliance (Y/N)
Column #		Name	(Y/N)	(Y/N) 4	Start time 5	Stop time 6	Dur. (min) 7	(Y/N) 8	(Y/N) 9	Rdg1 (Y/N) 10	Rdg2 (Y/N) 11	(Y/N) 12	(~ ft.) 13	14	(~MPH) 15	(scatt., brok. etc) 16	17	18	(Y/N) 19

Comments/ * Corrective Action

Emission Location: Haul Roads - (Steelmaking,DJJ,Heckett) — **Location:** Steelmaking

Date	Time	Observer	Nuisance call (Y/N)	Are visible Emissions present? (Y/N)	Start time	Stop time	Dur. (min)	Did visibles last longer than 10 minutes? (Y/N)	Is method 9 reading more than 20%? (Y/N)	Are visibles being transported off-site (Rdg1)(Y/N)	(Rdg2)(Y/N)	Revised fugitive emission plan rev'd? (Y/N)	Distance to emission point? (~ ft.)	Wind Direction?	Wind Speed? (Must be less than 30mph) (~MPH)	Sky Condition (scatt., brok. etc)	Cloud color	Plume Background	Compliance (Y/N)
Column #		Name	(Y/N)	(Y/N) 4	Start time 5	Stop time 6	Dur. (min) 7	(Y/N) 8	(Y/N) 9	Rdg1 (Y/N) 10	Rdg2 (Y/N) 11	(Y/N) 12	(~ ft.) 13	14	(~MPH) 15	(scatt., brok. etc) 16	17	18	(Y/N) 19

Comments/ * Corrective Action

Emission Location: Clean Fill Site — **Location:** North of new tube mill bldg.

Date	Time	Observer	Nuisance call (Y/N)	Are visible Emissions present? (Y/N)	Start time	Stop time	Dur. (min)	Did visibles last longer than 10 minutes? (Y/N)	Is method 9 reading more than 20%? (Y/N)	Are visibles being transported off-site (Rdg1)(Y/N)	(Rdg2)(Y/N)	Revised fugitive emission plan rev'd? (Y/N)	Distance to emission point? (~ ft.)	Wind Direction?	Wind Speed? (Must be less than 30mph) (~MPH)	Sky Condition (scatt., brok. etc)	Cloud color	Plume Background	Compliance (Y/N)
Column #		Name	(Y/N)	(Y/N) 4	Start time 5	Stop time 6	Dur. (min) 7	(Y/N) 8	(Y/N) 9	Rdg1 (Y/N) 10	Rdg2 (Y/N) 11	(Y/N) 12	(~ ft.) 13	14	(~MPH) 15	(scatt., brok. etc) 16	17	18	(Y/N) 19

Comments/ * Corrective Action

* Date, time, cause and description of corrective action taken must be documented.

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Fugitive emisison observation log

Page 2 of 2

Plant Name: Rocky Mountain Steel Mills

Emission Location: South of lime plant mill scale — Location: South of new tube mill bldg

Date	Time	Observer	Nuisance call	Are visible Emissions present?	If col 4 is (Y) and col 7 is >10 min. then fill out cols 5 thru 18. (col 19 always need to be completed)			Did visible last longer than 10 minutes?	Is method 9 reading more than 20%?	Are visibles being transported off-site		Revised fugitive emission plan req'd?	Distance to emission point?	Wind Direction?	Wind Speed? (Must be less than 30mph)	Sky Condition	Cloud color	Plume Background	Compliance
		Name	(Y/N)	(Y/N)	Start time	Stop time	Dur. (min)	(Y/N)	(Y/N)	Rdg1(Y/N)	Rdg2(Y/N)	(Y/N)	(~ ft.)		(~MPH)	(scatt., brok, etc)			(Y/N)
Column =				4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19

Comments/ * Corrective Action

Emission Location: South dump stations D & G — Location: South of shipping west

Date	Time	Observer	Nuisance call	Are visible Emissions present?	If col 4 is (Y) and col 7 is >10 min. then fill out cols 5 thru 18. (col 19 always need to be completed)			Did visible last longer than 10 minutes?	Is method 9 reading more than 20%?	Are visibles being transported off-site		Revised fugitive emission plan req'd?	Distance to emission point?	Wind Direction?	Wind Speed? (Must be less than 30mph)	Sky Condition	Cloud color	Plume Background	Compliance
		Name	(Y/N)	(Y/N)	Start time	Stop time	Dur. (min)	(Y/N)	(Y/N)	Rdg1(Y/N)	Rdg2(Y/N)	(Y/N)	(~ ft.)		(~MPH)	(scatt., brok, etc)			(Y/N)
Column =				4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19

Comments/ * Corrective Action

...ission Location: Haul Roads (Rod/Bar & Seamless) — Location: Rod/Bar mill and Tube mill

Date	Time	Observer	Nuisance call	Are visible Emissions present?	If col 4 is (Y) and col 7 is >10 min. then fill out cols 5 thru 18. (col 19 always need to be completed)			Did visible last longer than 10 minutes?	Is method 9 reading more than 20%?	Are visibles being transported off-site		Revised fugitive emission plan req'd?	Distance to emission point?	Wind Direction?	Wind Speed? (Must be less than 30mph)	Sky Condition	Cloud color	Plume Background	Compliance
		Name	(Y/N)	(Y/N)	Start time	Stop time	Dur. (min)	(Y/N)	(Y/N)	Rdg1(Y/N)	Rdg2(Y/N)	(Y/N)	(~ ft.)		(~MPH)	(scatt., brok, etc)			(Y/N)
Column =				4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19

Comments/ * Corrective Action

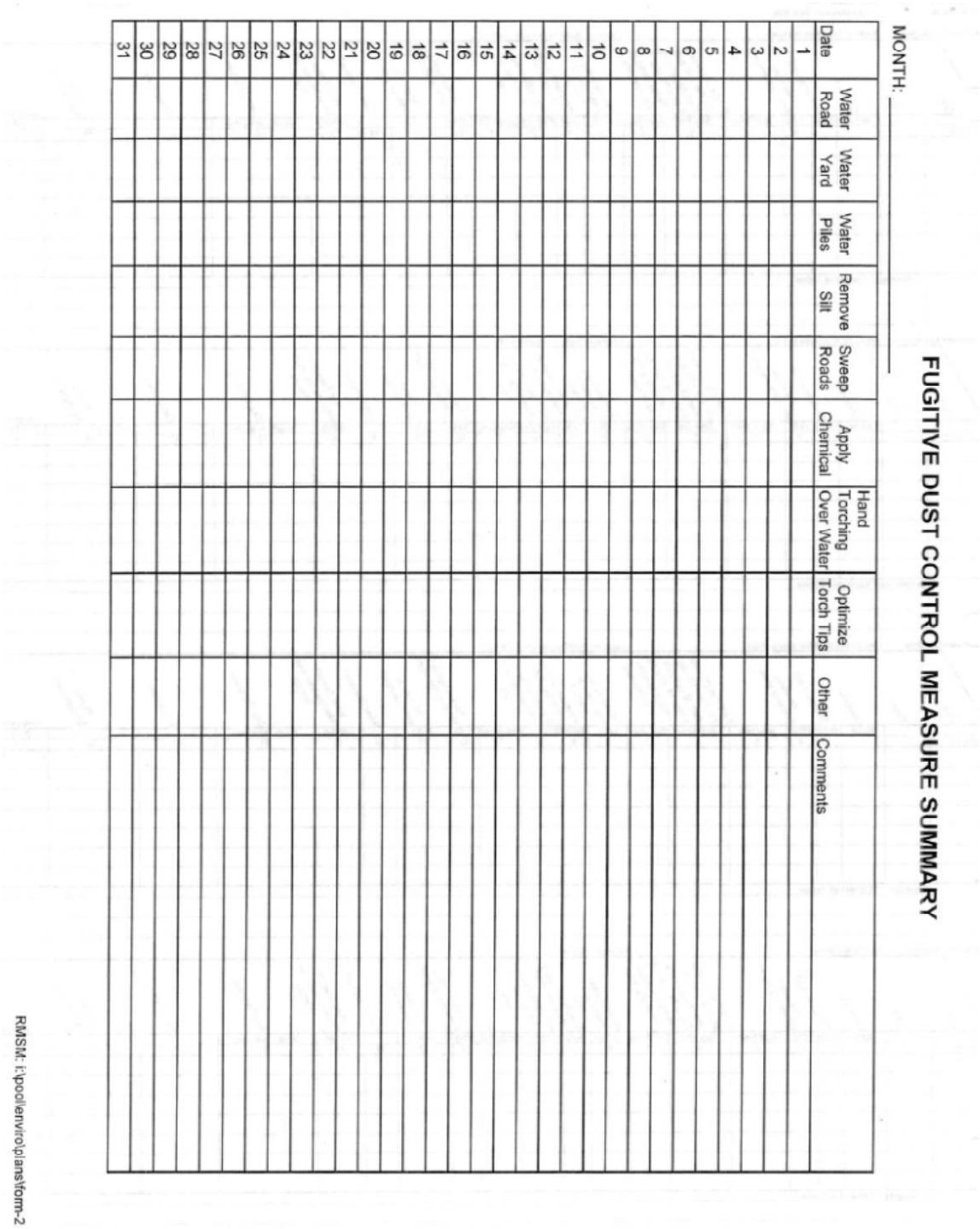
Emission Location: Haul Roads (Rail) — Location: Rail mill

Date	Time	Observer	Nuisance call	Are visible Emissions present?	If col 4 is (Y) and col 7 is >10 min. then fill out cols 5 thru 18. (col 19 always needs to be completed)			Did visibles last longer than 10 minutes?	Is method 9 reading more than 20%?	Are visibles being transported off-site		Revised fugitive emission plan req'd?	Distance to emission point?	Wind Direction?	Wind Speed? (Must be less than 30mph)	Sky Condition	Cloud color	Plume Background	Compliance
		Name	(Y/N)	(Y/N)	Start time	Stop time	Dur. (min)	(Y/N)	(Y/N)	Rdg1(Y/N)	Rdg2(Y/N)	(Y/N)	(~ ft.)		(~MPH)	(scatt., brok, etc)			(Y/N)
Column =				4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19

Comments/ * Corrective Action

* Date, time, cause and description of corrective action taken must be documented.

J:_POOL\ENVIRON\PLANS\Form - Daily log



MONTH: _____

FUGITIVE DUST CONTROL MEASURE SUMMARY

Date	Water Road	Water Yard	Water Piles	Remove Silt	Sweep Roads	Apply Chemical	Hand Torching Over Water	Optimize Torch Tips	Other	Comments
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
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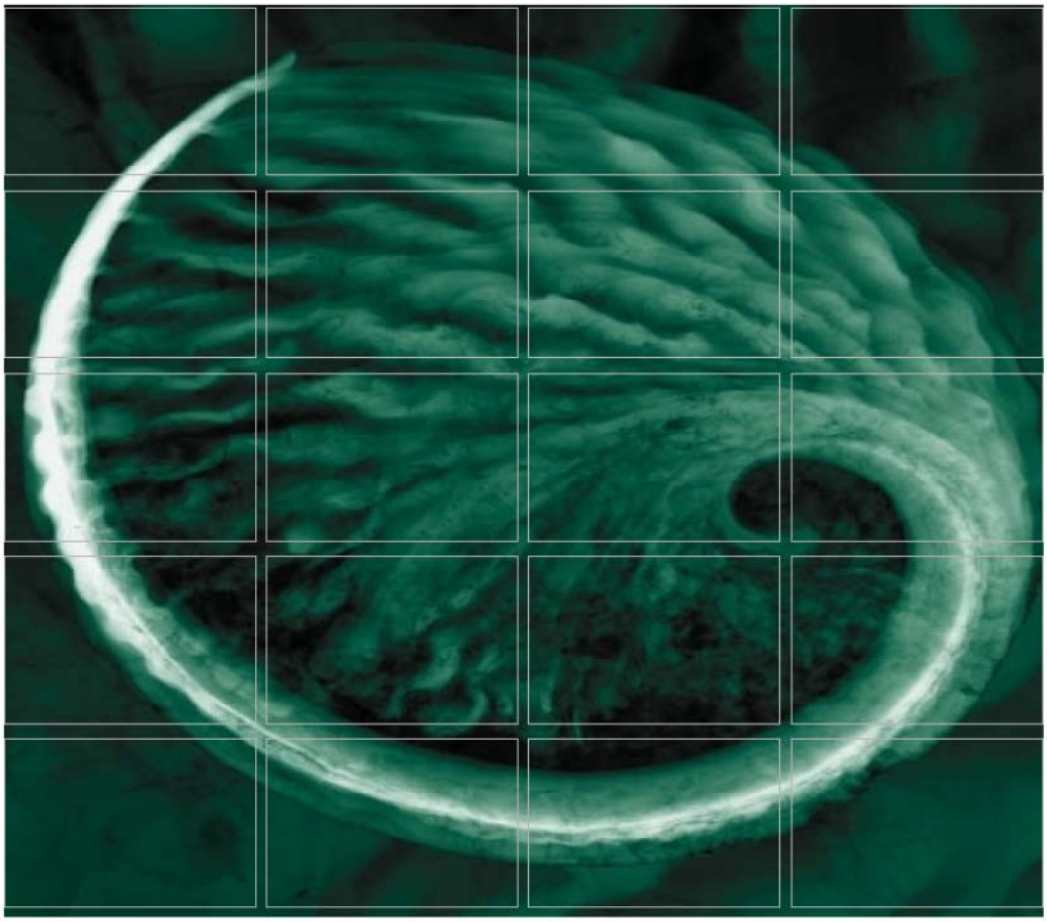
APPENDIX L

Audit Plan



CAA Audit Program

Evraz Rocky Mountain Steel

September 2009
(Revised September 2010 to Include Comments from EPA's October 22, 2009 CAA Audit Plan Approval Letter)

Presented to:
Evraz Rocky Mountain Steel
2100 South Freeway
Pueblo, Colorado 81004

ENVIRONMENTAL RESOURCES MANAGEMENT
6455 South Yosemite Street, Suite 900
Greenwood Village, Colorado 80111
(303) 741-5050
www.erm.com

Delivering sustainable solutions in a more competitive world

ERM

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1.0 INTRODUCTION

In accordance with the November 26, 2003 Compliance Order on Consent between Evraz Rocky Mountain Steel (ERMS) and the EPA/DOJ (Federal Consent Decree), Section XI, Paragraphs 65 through 74, ERMS is required to engage a third party consultant to perform an annual CAA audit of the facility. The scope of work defined in this document conforms to the requirements of the Consent Decree as well as to the subsequently EPA-approved audit letter submitted by RMSM dated January 24, 2005. This document was revised in September 2010 to address comments received from the EPA in their October 22, 2009 Audit Plan Approval letter.

2.0 SCOPE OF AUDIT

The audit will focus on a general assessment of current air quality compliance as required in paragraph 69 of the Federal Consent Decree. Specifically, it is expected that the audit firm will conduct all items pursuant to Paragraph 67 of the Federal Consent Decree. Consistent with the five year records retention requirements generally applicable to most air compliance documents, the initial audit completed under this program focused on the compliance records for the prior five years of operations. Where determined appropriate and supported by available records, review of facility compliance extended beyond the five year period. Beginning with the 2010 annual audit, the audit will review compliance of the facility during the period from completion of the on-site audit activities for the prior year audit to the current audit date.

The audit will consider any written agreements/amendments between ERMS and CDPHE regarding compliance with the Steelmaking, Rod/Bar Mill and Rail Mill operations. In addition to the above, the CAA audit will include a general assessment of compliance at the remainder of the ERMS facilities. Specifically, it is expected that the audit team will conduct all items pursuant to the requirements of the Federal Consent Decree.

The review of the facility compliance for this audit will include but not be limited to an assessment of the following:

- Cross reference of operating (emissions) units (EU) to the Emission Units indentified in the facility permits;
- Review of conformance with applicable O&M plans for each EU at ERMS through records and operating log review;
- Source emission monitoring and tracking in accordance with permit conditions;
- Emission calculation methodologies in accordance with permit conditions;
- Compliance assurance monitoring, continuous emissions monitoring (CEMs) and predictive emissions monitoring (PEMs) compliance for required sources;
- Verification of permit required data collection;

- Timely reporting;
- Conformance with compliance schedules;
- Verification that records retention follows permit requirements; and
- Permitting effect under the Clean Air Act of any modification to existing sources or installation of any new emission source equipment.

The audit will consist of a visual inspection of the facility, records reviews, and interviews with management and operations personnel. It is expected that the firm conducting the audit will review all of the grandfathered sources, construction permits including the Steelmaking PSD permit, renewal applications, Title V permits, the Federal Consent Decree 03-M-0608, and the State Consent Decree, Judgment, and Order signed 4/2/2002 and the Compliance Order on Consent signed on 11/27/2007 as modified, and agreements reached with the agencies during the period from 11/26/03 through July 2009. Additionally, the audit firm will review all of the Plans developed in support of these documents.

The audit firm is expected to review the facility compliance with respect to the following documents as well as the underlying Federal and Colorado regulations. Note that compliance can not be assessed against the permit modification or renewal applications, but these documents can be considered in evaluating the facility's status with respect to actions implemented to address existing permit or compliance issues:

Steelmaking

Operating Permit #95OPPB097

Construction Permits

Agency Agreements

Modification and renewal applications

Rod/Bar Mill

Operating Permit #95OPPB088

Construction Permits

Modification and renewal application

Rail Mill

Operating Permit #95OPPB086

Construction Permits

Agency Agreements

Modification and renewal applications

Seamless Mill

Operating Permit #95OPPB089

Construction Permits

Grandfathered Sources

Modification and renewal applications

Utilities

Operating Permit #95OPPB098

Construction Permits

Grandfathered Sources

Modification and renewal applications

ERMS will provide to the audit firm all records as described in paragraphs 69-71 of the Federal Consent Decree so that they can accomplish their work.

3.0 AUDIT SCHEDULE

The typical schedule for each audit will be as shown in Figure 1. The actual number of days to complete each audit event will vary depending on proposed number of auditors, anticipated level of effort and facility staff availability to support the audit.

Figure 1 *Typical Audit Schedule*

Day	*Activity*
Day 1 - Morning	• Opening conference • Health & Safety briefing by site personnel • Orientation tour
Day 1 - Afternoon	• Initial records review • Daily debriefing with audit team and ERMS site personnel to review findings to date.
Day 2 - Morning	• Further records review • Interviews • Focused field verification inspections
Day 2 - Afternoon	• Continue Field and Interview Verification Activities • Daily debriefing with audit team and ERMS site personnel to review findings to date.
Final Day - Morning	• Further records review • Interviews • Focused field verification inspections
Final Day - Afternoon	• Focus on any unresolved audit questions • Closing Conference with Site Management
10 Working Days After Completing On-site Activities	Draft Report Due to RMSM
10 working Days Following Receipt of Draft Report	ERMS review and comment on draft report and provide additional information to auditors as appropriate.
One Week Following Receipt of Final Comments from ERMS	Prepare Final Report and submit to ERMS
One Week Following Receipt of Final Report from Consultant	ERMS provides copy of final audit report to EPA.

The first audit was completed during the 4th Quarter of 2009. It is anticipated that the subsequent annual audits will be conducted during each successive 4th quarter until the Federal Consent Decree is closed out or is modified to establish an alternate audit frequency schedule.

4.0 REPORT OF AUDIT FINDINGS

As is indicated in the Audit Schedule, the initial findings from the audit will first be discussed with ERMS personnel and any outside consultants that ERMS may include during the daily debriefings and audit closeout meeting. These discussions will address any clarifications and factual issues that may arise during the audit and allow ERMS to provide additional documentation or clarification to resolve potential issues identified. After this initial discussion, the draft audit findings will be presented in a summary table format which will include a description of the finding and the pertinent regulatory and/or permit citation, recommended action, and root cause. This table will be provided as an attachment to an Audit Report which will be prepared to document the manner in which the audit was conducted, a description of the audit team, the documents reviewed, the dates of the audit, the audit scope and other key audit information. The draft audit report will be finalized following review and comment by ERMS. The Audit Report will conform to requirements in Paragraph 73 and 74 of the Federal Consent Decree.

5.0 AUDIT FINDINGS FOLLOW UP

Upon finalization of the audit findings, ERMS will develop a schedule for corrective actions including planned completion dates for resolution of each finding. This schedule will be reviewed on a monthly basis by the ERMS Environmental Manager until all corrective actions are completed.